



INFRASTRUCTURE BRIEFING REPORT

Hurricanes Gustav & Ike Update

**The Louisiana Department of Environmental Quality (LDEQ)
Briefing Report on
Hurricanes Gustav and Ike:
September 1-14, 2008**

**A Response to the
Governor's Office of Homeland Security and Emergency
Preparedness (GOHSEP)'s
Request for Hurricane Related Information to
be Presented as Part of Briefing Books
for the Louisiana Congressional Delegation**

Sunday, September 14, 2008

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EXECUTIVE SUMMARY

As part of the Louisiana Emergency Operations Plan dated July 1, 2007, the Louisiana Department of Environmental Quality (LDEQ) participates in emergency response actions with the primary function of Emergency Support Function (ESF)-10: Oil Spill, Hazardous Materials and Radiological. In addition, the LDEQ supports the following functions:

- ESF-2 Communications
- ESF-3 Public Works and Engineering
- ESF-4 Firefighting
- ESF-5 Emergency Management
- ESF-7 Resource Support
- ESF-8 Public Health and Medical Services
- ESF-11 Agriculture
- ESF-12 Energy and Utilities (Water and Wastewater Utilities)
- ESF-14 Community Recovery, Mitigation, and Economic Stabilization
- ESF-15 Emergency Public Information

The LDEQ conducts the following required actions within the primary function (ESF-10):

- Prepare Peacetime Radiological Response Plan and detailed implementing procedures for all primary functions, to include the procedures by which the office will be alerted and activated for 24-hour operations if needed.
- Prepare requirements for supporting departments, agencies and offices and initiate coordination with supporting departments to insure that they are aware of their roles and are prepared to take necessary action.

In support of the above functions, the LDEQ conducts the following required actions:

- 1) Coordinate with the department, agency, or office having the primary responsibility for each function.
- 2) Respond and provide support based on actions requested.
- 3) Develop detailed implementation procedures by which the office will be alerted and activated for 24-hour operations if requested to do so by a primary agency.

Below is a concise data-driven report with supporting attachments that include spreadsheets, timelines, maps, and photographs that detail the department's primary and support functions.

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REPORT: HURRICANES GUSTAV & IKE

I. Emergency Declaration *(See Attachment A. Emergency Declarations for Hurricanes Gustav and Ike and Related Actions of Regulatory Flexibility)*

On August 31, 2008, LDEQ Secretary Harold Leggett issued a Declaration of Emergency and Administrative Order (hereinafter "Order"). An updated and amended version of this document was issued on September 6, 2008. This Order was for Hurricane Gustav. On September 12, 2008, LDEQ Secretary Harold Leggett issued a Declaration of Emergency and Administrative Order (hereinafter "Order"). This Order was for Hurricane Ike. The Orders serve the dual purposes of:

- providing useful information to the public about Louisiana's environmental laws and regulations, and
- providing regulatory flexibility essential to the hurricane recovery efforts, as allowed under the Louisiana Environmental Quality Act (see, e.g., La. Revised Statutes 30:2033).

The public information function of the Orders includes among other things:

- guidelines and requirements regarding the management of hurricane-generated debris consistent with the "Comprehensive Plan for Disaster Clean-up and Debris Management";
- guidance to assist operators of sanitary wastewater treatment systems in start up and operation;
- guidelines for temporary housing sites, including requirements relating to sanitary wastewater treatment and discharge, storm water discharges associated with construction, household waste collection, recycling, and site closure; and
- guidance for compliance with the Louisiana Emission Standards for Hazardous Air Pollutants, as they relate to asbestos, during demolition and renovation activities.

The regulatory flexibility provided by the Orders consists primarily of the temporary relaxation of procedural requirements for activities in the defined Emergency Areas, in order to expedite the restoration of important services and the removal of the enormous volume of hurricane debris. The Orders have minimal effect on substantive requirements, and do not allow any activity that would endanger human health or the environment.

The Orders address the following:

- wastewater treatment systems;
- solid waste management;
- hazardous waste;
- open burning;
- air pollution sources other than open burning;
- asbestos cleanup;
- underground storage tanks;
- special waste (reuse and recycle);
- public notice and public participation procedures regarding proposed permit actions;
- records management; and
- extension of time to comply with specified deadlines.

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II. Debris Management (*See Attachment B. Debris Management Report*)

In support of the ESF-3, the LDEQ authorizes and regulates activities associated with the handling of debris generated from hurricane response and recovery. Debris types generated may include green wastes, household hazardous materials, demolished structures, munitions, and others. Most debris handled during the Hurricane Gustav response has been green waste from fallen trees and branches. To date, a similar preliminary observation has been made for Hurricane Ike.

As of September 14, 2008, a total of **180** debris management sites have been approved for both Hurricanes Gustav and Ike. Of these, **58** are specific to the operations of the ESF-3 primary agency - the Louisiana Department of Transportation and Development (LDOTD). The remaining **122** debris management sites are authorized and regulated by the LDEQ for the following activities:

- 7 Staging only
- 5 Staging, Chipping & Grinding Sites
- 54 Disposal Sites
- 0 Grinding Only
- 2 Chipping & Burning Sites
- 4 Chipping, Grinding, Staging and Burning Sites
- 6 Chipping & Grinding Site
- 24 Burning Only Sites
- 3 Chipping, Grinding & Burning
- 14 Staging & Burning Sites
- 1 Staging, Chipping & Burning
- 1 Staging, Grinding & Burning
- 0 Chipping Only

The development of the ***Comprehensive Plan for Disaster Cleanup and Debris Management*** fully engaged state, industry, and local government officials. The LDEQ is fully committed to the implementation of this Plan which was designed to create a level playing field for all stakeholders and assure the public that human health, safety, welfare and environmental concerns remain paramount.

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III. Wastewater Treatment Systems (WWTs) *(See Attachment C. Facility Assessment Report)*

In support of the ESF-12, the LDEQ participates in the assessment of wastewater treatment (sanitary sewage collection and treatment) facilities. Facilities classified as "Major" are those systems that discharge more than 1 Million Gallons per Day (GPD). As of Sunday, September 14, 2008, **all 101 Major** WWTs have been assessed. Five remain inoperable:

- Donaldsonville (Ascension Parish) - 1
- Denham Springs (Livingston Parish) - 1
- Port Sulphur, Buras, Bootheville (Plaquemines Parish) - 3

Facilities classified as "Significant Minors" include those WWTs that discharge between 50,000 and 1 Million GPD. As of Sunday, September 14, 2008, **1,041 out of a total of 1,135 Significant Minors (92%)** WWTs have been assessed. A small percentage of Significant Minors in the most heavily affected areas continue to be inoperable or impaired in operation primarily due to power outages and flooding.

IV. Drinking Water Facilities *(See Attachment D. Water Utility Information)*

In support of the ESF-12, the LDEQ continues to coordinate with the Louisiana Department of Health and Hospitals (LDHH) to ensure support for the assessment of public and private drinking water systems in the state. As of September 14, 2008, the following assessments were conducted by LDHH, the US Environmental Protection Agency (USEPA), and the Louisiana Rural Water Association (LRWA):

- Total Service Connections: **1,490,894**
- Connections Adversely Affected: **50,139**
- Percent Not Needing Boil Water Advisory (BWA): **97%**
- Percent Needing BWA: **3%**

V. Industrial Facilities *(See Attachment C. Facility Assessment Report)*

In support of the ESF-10, the LDEQ conducts assessments of the following industrial facilities:

Priority Facilities: Priority facilities are those that have the greatest potential to do harm to humans and/or the environment. A total of **292** assessments of permitted priority facilities have been completed with no significant findings or problems associated with Hurricane Gustav.

Underground Storage Tanks (USTs): These are facilities that are registered with the LDEQ and are monitored through inspections and reports. A total of **2,091 UST sites** have been assessed with no significant findings or problems associated with Hurricane Gustav.

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VI. Oil and Hazardous Material Releases *(See Attachment E. Spills/Releases Report)*

In support of the ESF-10, the LDEQ is assessing and mapping unauthorized releases of oil and hazardous materials. To date, we have recorded 75 spills/releases attributable to Hurricane Gustav and 5 spills/releases attributable to Hurricane Ike.

- 74 oil spills attributable to Gustav have been assessed with **78%** cleaned up to date
- 1 spill of benzene and xylene was reported attributable to Hurricane Gustav
- 4 oil spills were reported attributable to Hurricane Ike
- 1 release of sulfur dioxide (air emission) was attributable to Hurricane Ike

VII. Radiation Sources *(See Attached F. Radiation Assessment Report)*

In support of the ESF-10, the LDEQ has assessed all **384** regulated sources. All sources are secure and no problems have been encountered.

VIII. Superfund Sites *(See Attached G. Superfund Site Assessment)*

In support of the ESF-10, all **19 superfund sites** (those sites placed on the National Priorities List) in affected parishes were assessed. No significant problems were discovered.

IX. Aquatic Mortalities *(See Attached H. Fish Kill Report)*

In support of the ESF-11, to date, there have been **24** fish kill reports by citizens to the LDEQ attributable to Hurricane Gustav. 100% have been investigated. Fish kills are not uncommon after major storms due to the input of oxygen-demanding substances into water bodies from native vegetation, sediment re-suspension, and untreated sewage discharges. The LDEQ anticipates that additional fish kill reports will be received due to the landfall of Hurricane Ike.

X. Emergency Public Information

In support of the ESF-15, the LDEQ Communications Division staffed the Joint Information Center (JIC) at GOSHEP from August 28 to September 14. Through team efforts with other communications departments throughout state government, information was provided to the public and media. The team's activities included writing, editing and posting press releases, as well as answering questions from the media and public, often working 24-hours per day.

XI. Visual Images of Hurricane Gustav Impacted Areas *(See Attachment I. Photographs)*

- Town of Grand Isle (6 images)
- Port Fourchon (8 images)
- Town of Golden Meadow (7 images)
- Town of Leeville (5 images)

ATTACHMENT A

Emergency Declarations for Hurricanes Gustav and Ike and Related Actions of Regulatory Flexibility

**STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL
QUALITY**

**First Amended Declaration of
Emergency and Administrative Order**

**Hurricane Gustav and its Aftermath
Agency Interest No. 160278**

September 6, 2008

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**STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**IN THE MATTER OF
HURRICANE GUSTAV
AND ITS AFTERMATH**

AGENCY INTEREST NO. 160278

**FIRST AMENDED DECLARATION OF EMERGENCY
AND ADMINISTRATIVE ORDER**

Pursuant to the authority granted to me by Louisiana Revised Statutes 30:2001 *et seq.*, and particularly La. R.S. 30:2033 and 2011(D)(6), I hereby make the following findings, declaration and order, which supercede the Declaration of Emergency and Administrative Order issued by this agency on August 31, 2008, and amend the following provisions thereof: §1.g.i, §1.g.ii, §1.h, §1.i.ii, §2.e.iii, §4.a, §5.c, §5.d, §5.f, §5.f.v, §5.g, §5g.ii, §5.h, §5.h.ii, §9, and Appendix F.

FINDINGS AND DECLARATION

1. On the 1st day of September, 2008, Hurricane Gustav (hereinafter "the Hurricane") is expected to make landfall on the coast of Louisiana, causing widespread damage within the State of Louisiana.
2. By State of Louisiana Proclamation No. 51 BJ 2008, Louisiana Governor Bobby Jindal declared on August 27, 2008, that a state of emergency exists in the state of Louisiana, as the Hurricane is expected to impact the coastal parishes of Louisiana with hurricane strength winds, wave surges, high tides, torrential rain and tornado activity, threatening the lives and property of the citizens of the State of Louisiana.
3. The parishes in which local government and/or the Governor has declared or declares an emergency shall constitute the specific areas covered by this Declaration of Emergency and Administrative Order (hereinafter "Order"). These areas shall herein be referred to as the "Emergency Areas."

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4. I find that the Hurricane has created or will create conditions that require immediate action to prevent irreparable damage to the environment and serious threats to life or safety throughout the Emergency Areas.

WHEREFORE, I hereby declare that an emergency exists, and that the following measures are necessary to prevent irreparable damage to the environment and serious threats to life or safety throughout the Emergency Areas.

ORDER

Within the Emergency Areas:

§ 1. Wastewater Treatment Systems

a. Upset Provisions

Permittees with Louisiana Pollutant Discharge Elimination System (LPDES) permits should consider activating the upset provisions in their permits. LAC 33:IX.2701.N.1 defines upset as the following:

An exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

An upset constitutes an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the requirements of LAC 33:IX.2701.N.3 are met. This Order extends upset provisions to include water quality based effluent limitations. For upsets caused by this hurricane, the 24-hour oral notification is waived unless the non-compliance may endanger human health.

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b. Authorization is hereby granted to discharge water placed in storage tanks or other containers or vessels for the purpose of stabilization, provided that the tanks, containers or vessels had been emptied of their previous contents prior to filling with the water. To the extent practicable, discharges should not contain free oil, hydrocarbons or other pollutants in other than trace amounts. No free oil shall mean that the discharge shall not create a visible sheen. Water that accumulates in storage tanks, containers or vessels as a result of rainfall, flooding or tidal surge may be discharged under the same conditions.

c. Appendix A sets forth guidance to operators of sanitary wastewater treatment systems to aid in the return to compliant operations to prevent further damage to the environment and serious threats to life or safety throughout the Emergency Areas.

d. Discharges from Potable Water Treatment Systems

The discharge of pollutants from all potable water treatment systems is subject to the Louisiana Pollutant Discharge Elimination System (LPDES) General Permit for potable water treatment plants. Under ordinary circumstances, LDEQ requires the submission of a complete Notice of Intent to Discharge, and evaluation and response from LDEQ prior to commencement of discharge.

However, to alleviate shortages of potable water in the Emergency Areas, authorization is hereby granted for new discharges of wastewaters associated with potable water treatment systems in the Emergency Areas, and the requirement for submission of a Notice of Intent to Discharge, evaluation and response from LDEQ is hereby waived. Any such discharges must comply with LPDES Permit LAG380000, Potable Water Treatment Plant General Permit. The General Permit effluent limitations and requirements can be viewed at <http://www.deq.louisiana.gov/portal/portals/0/permits/lpdes/LAG380000.pdf>. A copy of the General Permit can be obtained by calling the Office of Environmental Services at (225) 219-3181.

Deadlines for monitoring and reporting requirements are addressed in Section 14 of this Order.

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Authorization to discharge pursuant to this Order shall terminate upon the expiration of this Order. Any facility owner or operator requiring continued coverage under the General LPDES Permit subsequent to the expiration of this Order shall submit a Notice of Intent to Discharge from a Potable Water Treatment Plant to the Department by the expiration date of this Order. The application form, H2O-G, can be found at <http://www.deq.louisiana.gov/portal/Default.aspx?tabid=1837>, or by calling the Office of Environmental Services at (225) 219-3181.

Any owner or operator who commences discharge of pollutants from a portable potable water treatment unit pursuant to this Order shall submit written notification to the Office of Environmental Services at P.O. Box 4313, Baton Rouge, LA 70821-4313, within five (5) days of the commencement of the discharge.

e. Discharges from Temporary Housing Locations

Guidelines pertaining to sanitary discharges related to temporary housing sites are provided in Appendix B of this Declaration.

f. Gray Water Discharges

The Department hereby authorizes discharges of gray water within the Emergency Areas that comply with the requirements set forth in Appendix C.

g. Storm Water Discharges

i. U.S. Army Corps of Engineers

The Department hereby authorizes the U.S. Army Corps of Engineers to discharge storm water runoff from construction activities related to hurricane response activities in the Emergency Areas. Best Management Practices to avoid erosion and offsite transport of sediments are to be implemented to the greatest extent practicable. The Storm Water General Permit For Construction Activities Five (5) Acres Or More (LAR100000) can be accessed at <http://www.deq.louisiana.gov/portal/Portals/0/permits/lpdes/LAR100000.pdf>, and contains applicable Best Management Practices for erosion and sediment controls in Part IV. Storm Water Pollution Prevention Plans.

ii. Electrical and Communications Utility Companies

The Department hereby authorizes public utility companies providing electricity or communications services to discharge storm water runoff from construction activities related to hurricane response activities in the Emergency Areas, including restoration of electrical and communication services. Best Management Practices to avoid erosion and offsite transport of sediments are to be implemented to the greatest extent practicable. The Storm Water General Permit For Construction Activities Five (5) Acres Or More (LAR100000) can be accessed at <http://www.deq.louisiana.gov/portal/Portals/0/permits/lpdes/LAR100000.pdf>, and contains applicable Best Management Practices for erosion and sediment controls in Part IV. Storm Water Pollution Prevention Plans.

h. Biosolids Land Application Projects/Sites Management:

i. If flooding should occur as a result of a hurricane, land application of Class B Biosolids should not take place at permitted land application sites.

ii. Land application of a Class B Biosolids at permitted sites should not resume until flooding has subsided and the water table is below 2 feet.

iii. Facilities which prepare Exceptional Quality (EQ) Biosolids should re-prepare/retreat EQ Biosolids or dispose of the EQ Biosolids if stored "on-site" and subjected to hurricane flooding.

iv. Facilities utilized to prepare sewage sludge to EQ Biosolids should halt operation during a hurricane and should not resume operation until the flooding has subsided and the facility has been properly cleaned.

For additional information, contact Kilren Vidrine, LDEQ, Office of Environmental Services, Water Permits Division, 225-219-3012.

i. Acceptance of sewage sludge:

i. Operators of wastewater treatment facilities who are not already authorized by permit to do so are hereby authorized to accept hauled sewage sludge (as defined at LAC 33:IX.7301.B), provided that the following criteria exist:

a. Acceptance of the sewage sludge is necessary to facilitate hurricane recovery (e.g., by preventing septage from backing up in homes or by

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preventing lift stations from overflowing or otherwise malfunctioning). This authorization does not apply to the routine pumping of septic tanks, portable toilets, marine sanitation devices, or holding tanks not related to the hurricane recovery;

b. The wastewater treatment facility can handle the hauled sewage sludge without contributing to adverse effects on human health or the environment or impeding recovery of the treatment facility itself; and

c. The operator immediately notifies the LDEQ Water Permits Division of the acceptance of the sewage sludge, by telephoning Melvin Mitchell or Kilren Vidrine, at (225) 219-3013, and provides written notification within 30 days to the Office of Environmental Services, Water Permits Division, P.O. Box 4313, Baton Rouge, Louisiana 70821-4313, or by e-mail to mitch.mitchell@la.gov or kilren.vidrine@la.gov.

j. For all discharges authorized under this Order, the following conditions apply:

i. The owner/operator shall notify the Office of Environmental Services, Water Permits Division by no later than September 8, 2008, that a discharge has occurred or is anticipated.

ii. For each discharge, the owner/operator shall record the location of the discharge, the date and time the discharge commenced and ceased, the approximate volume of the discharge, any known or suspected pollutants present in the discharge and the receiving water body. The specific type of discharge and a reference to the specific section(s) of this Order authorizing the discharge shall be included. These records shall be kept on-site and available for inspection by the Office of Environmental Compliance, Surveillance Division and reported to the Office of Environmental Services, Water Permits Division by no later than thirty days after the expiration of this order .

iii. The owner/operator shall take all practicable measures to minimize the volume and duration of the discharge.

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iv. The owner/operator shall take all practicable measures to prevent or minimize erosion due to the discharge and any other potential impacts on the receiving water body.

v. All discharges authorized under this Order are solely for the purpose of protecting human health and property and to facilitate rescue and recovery efforts.

§ 2. Solid Waste Management

a. Owners and operators of solid waste management facilities and local governments should consult and adhere to the State of Louisiana “Comprehensive Plan for Disaster Clean-up and Debris Management,” revised August 2006 edition (Debris Management Plan), which appears as Appendix D, except where the Debris Management Plan may be in conflict with the provisions of this Order. In the event of conflict, the provisions of this Order shall prevail.¹ Provisions of the Debris Management Plan not specifically allowed under this Emergency Order include the expanded definition of Construction and Demolition Debris, references to enhanced Construction and Demolition Debris Landfills, and burning of C&D debris.

i. Ash residue from the combustion of yard trash or clean wood waste shall be disposed of in accordance with the Debris Management Plan.

ii. Vegetative debris shall be managed in accordance with the Debris Management Plan. The Department may authorize disposal of vegetative debris containing incidental, *de minimus*, or trace amounts of contamination in a Type II or III landfill on a case-by-case basis.

iii. Putrescible waste (e.g., rotting food that has been removed from unsalvageable refrigerators and freezers) shall be disposed of in a permitted Type II landfill in accordance with the Debris Management Plan.

¹ For example, the definition of “construction and demolition debris” in the Debris Management Plan includes “furniture, carpet, painted or stained lumber contained in the demolished buildings.” These are not, pursuant to the terms of this Order, permissible for disposal in a Type III (C&D) landfill.

iv. The disposal of excessive accumulations of small animal carcasses shall be in accordance with the Louisiana Department of Health and Hospitals sanitary code and the Debris Management Plan. The disposal of large animal carcasses (e.g. horses, cows) shall be in accordance with the instructions from the Louisiana Department of Agriculture and the Debris Management Plan.

b. Owners and operators of solid waste management facilities permitted by the Department before the Hurricane are authorized to make all necessary repairs to restore essential services and the functionality of stormwater management and leachate collection systems damaged by the Hurricane, without prior notice to the Department. Within thirty (30) days of commencing the work of such repair or replacement, however, the permittee shall notify the Department in writing, describing the nature of the work, giving its location, and providing the name, address, and telephone number of the representative of the permittee to contact concerning the work.

c. Uncontaminated construction and demolition debris may be disposed of in a permitted Type III landfill. On a case-by-case basis, the Department may authorize disposal of construction and demolition debris containing incidental, *de minimus*, or trace amounts of contamination in a Type III landfill. Uncontaminated construction and demolition debris may be managed at a temporary staging area authorized by the Department. Uncontaminated construction and demolition debris that is mixed with other uncontaminated hurricane-generated debris, such as white goods or household hazardous waste, should be segregated from other solid waste prior to disposal in a permitted landfill or authorized disposal site, except in cases where segregation is not practicable.

d. White goods (i.e., unsalvageable air conditioners, stoves and range tops, as well as refrigerators and freezers from which food has been removed) shall be stored in an area separate from other solid wastes and shall be stored in a manner that prevents vector and odor problems. No white goods may be stored at a site without a permit or other written authorization from the Department specifically allowing storage in that area. All white goods shall be removed from the storage facility or staging area and

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sent offsite for recycling, or recycled onsite, within ninety (90) days of initial receipt at the site.

e. Permitted landfills or transfer stations within or outside of the Emergency Area, which accept hurricane-generated debris in accordance with the terms of this Order, may accept hurricane-generated debris for disposal or storage without the need to first modify existing permits, as follows:

i. Prior notification is submitted to the Department describing any proposed deviations from permit conditions;

ii. any proposed deviations from permit limits must be within the bounds of engineering assumptions used in the design of the facility, and conducted in accordance with the Debris Management Plan (Appendix D); and

iii. Written approval by the administrative authority (including electronic mail) of the proposed deviations is received from the Department.

Operators of landfills or transfer stations approved for permit deviations under this Order may be required to submit application for modifications of their existing permits to address any long-term impacts of accepting hurricane-generated debris on operations and closure that are not addressed in existing permits if it is determined long term impacts will result from these activities. Long-term impacts are those that will extend past the expiration date of this Order. The requests for modification shall be submitted no later than thirty (30) days after expiration of this Order. No permit fee will be required for any modifications necessitated solely by the hurricane clean-up activities. The Department may, for good cause shown, issue a temporary authorization pursuant to LAC 33:VII.511.B.1.a for activities that are addressed in a permit modification request as provided for in this subsection, to authorize operations after expiration of this Order, pending a decision on the modification request.

f. Site Authorizations will be considered in accordance with procedures contained in the Debris Management Plan. Authorizations may be requested by providing a notice to the Department on approved forms (Debris Management Site Form: <http://www.deq.louisiana.gov/portal/Portals/0/HurricaneGustav/Emergency%20Debris%20>

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Management%20Site%20Request%20Form.pdf; Procedures to Approve Emergency Debris Management Sites: <http://www.deq.louisiana.gov/portal/Portals/0/HurricaneGustav/Procedures%20To%20Approve%20Emergency%20Debris%20Management%20Sites.pdf>).

g. Construction and demolition debris generated from residential structures of four units or less that are subject to a government-ordered demolition shall be disposed of in accordance with the Debris Management Plan (Appendix D), except Regulated Asbestos Containing Material (RACM) shall be disposed of in a Type I/II landfill. A request by a landfill owner or operator for authorization to accept such ACWM must include a certification that the owner or operator will manage the ACWM in accordance with the landfill's QA/QC plan and LDEQ requirements. See Section 6.a, *Asbestos Clean-up*, of this Order, for additional information on receiving ACWM in Type I and II landfills. The Department will provide a written response to the request for authorization to accept solid waste and asbestos containing waste material in a Type I or II landfill.

h. Waste Tires

The Secretary of the Louisiana Department of Environmental Quality finds that the conditions resulting from the Hurricane may cause or contribute to an extraordinary drain on State of Louisiana resources and in particular on the Waste Tire Management Fund (WTMF) provided for in La. R.S. 30:2418. Those conditions include the damaging and/or abandonment of automobiles in the affected areas. It is anticipated that most of these vehicles will be salvaged or scrapped, with the four to five tires on each vehicle being sent for either disposal, resale, and or recycling. This sudden influx of waste tires and used tires into the system may result in an inordinate immediate drain on the WTMF and an inability to properly account for the diversion of tires to recycling projects and for resale. As a result, the Secretary does hereby order the following:

i) All tires removed from vehicles within the affected areas that are salvaged and/or scrapped because of damage resulting from the Hurricane shall be tracked and are ineligible for payment from the WTMF.

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ii) All tires that are collected in the affected areas through hurricane debris collection activities and deposited at parish collection centers, if established, will be ineligible for payment of the WTMF subsidy, but are to be treated as debris under existing debris removal programs. Tires must be classified for either recycling under existing approved beneficial uses, or for resale. Any person who claims for resale any tires from salvaged or scrapped vehicles in the affected area shall report to the Department the number of such tires classified for resale, and their destination, within fifteen (15) days.

iii) All tires that are removed from automobiles in the affected area that are destined for salvage because of damage resulting from the Hurricane must be collected, transported, and either recycled or disposed of with an accompanying manifest that lists the tires as being ineligible for the WTMF. If the tires are deemed “used tires” for resale, such a declaration must be reported to the Department by the person responsible for removal of the tires from the vehicle being scrapped and or salvaged. The report must contain the VIN number of the vehicle being scrapped and or salvaged, the number of tires being removed, the number being classified for resale, and the number classified for recycling and/or disposal.

iv) Eligibility of tires for the WTMF subsidy shall be governed by the most current version of this document.

§ 3. Hazardous Waste

a. In accordance with the Debris Management Plan, hazardous waste generated as a result of the hurricane event must be separated from other hurricane-generated waste and disposed of at a permitted hazardous waste disposal facility. Household wastes collected during this event, which are exempt from the regulatory requirements applicable to hazardous wastes, must be managed not only in an environmentally sound manner but also in accordance with the appropriate LDEQ rules and regulations governing the storage and processing of this type of waste.

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b. A blanket approval of time extensions under Louisiana Administrative Code 33:V.1109.E.2 is necessary within the Emergency Areas for hazardous waste generators and small quantity generators for the storage of their hazardous wastes on site, pending the cleanup of the hurricane damage and restoration of essential services. The rules authorize a thirty (30) day extension because of unforeseen and uncontrollable circumstances. The specific effects of the Hurricane were unforeseen and uncontrollable. Therefore, to avoid having to issue a potentially large number of individual approvals on a case-by-case basis and waste limited agency resources during the time of emergency, the Department authorizes a general extension of time of thirty (30) days from the expiration of this Order for all such hazardous waste generators and small quantity generators for the storage of their hazardous wastes on site, in the parishes within the Emergency Areas, and where their ninety (90) day accumulation period expires within the term of this Order.

§ 4. Open Burning

a. The Department authorizes local governments or their agents to conduct the open burning of hurricane-generated trees, leaves, vines, twigs, branches, grass, and other vegetative debris within or outside of the Emergency Area, provided that the provisions of LAC 33:III.1109.D.6. are met, and it is consistent with the Debris Management Plan (Appendix D). This Order does not authorize any other outdoor burning of non-listed debris streams. Within seven (7) days of commencing any such burning, the local government or its agent shall notify the Department in writing, describing the general nature of the materials burned, stating the location and method of burning, and providing the name, address, and telephone number of the representative of the local government to contact concerning the work and the anticipated duration of the burning event. This Order does not relieve the local government or the agent from any requirement to obtain an open burning authorization from any other governmental entity empowered to grant such authorizations. Notwithstanding the provisions of this paragraph, the burning of asbestos-containing materials, construction and demolition debris, solid waste (other than vegetative debris) or hazardous waste is prohibited.

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b. The Department will consider, on an individual basis, requests for approval for open burning, by persons other than local governments or their agents, of hurricane-generated trees, leaves, vines, twigs, branches, grass, and other vegetative debris. Any such burning approved by the Department must be conducted in compliance with the requirements of LAC 33:III.1109.D.6.

§ 5. Air Pollution Sources Other than Open Burning

a. The Department authorizes the minor repair of any previously permitted stationary source of air pollution that was damaged by the Hurricane to restore it to its previously permitted condition without prior notice to the Department. Within thirty (30) days of commencing such repairs, however, the permittee shall notify the Department in writing, stating the location and nature of the work and providing the name, address, and telephone number of the representative of the permittee to contact concerning the work. Minor repairs are repairs that would not constitute reconstruction under any definition of 40 CFR Part 60 or 63 and that could not affect potential to emit any pollutant, and that would not constitute a violation of any other provision of the NSPS, MACT, or NESHAP standards. Repairs that would constitute reconstruction under any definition of 40 CFR Part 60 or 63, or repairs that could affect potential to emit any pollutant are not authorized by this Order.

b. The Department will consider, on an individual basis, requests for approval for, but not limited to, the following sources of air pollution:

i) temporary air pollution control devices, such as portable flares, used for vessel and pipeline segment purging and the limited operation of facilities with damaged vapor control equipment;

ii) portable storage tanks, used for interim storage while damaged equipment is being repaired; and

iii) repairs, other than the minor repairs addressed in Section 5.a above, of permitted stationary sources that have been damaged by the Hurricane, provided that

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the sources are restored or replaced with equipment that is identical or the functional equivalent, to meet permit conditions.

Requests should be directed to the Office of Environmental Services, Air Permits Division.

c. The Department authorizes temporary gasoline and diesel fueling stations at regulated industrial facilities for the express purpose of refueling onsite vehicles essential for plant operations, vehicles of employees, and local emergency authorities and responders.

d. The throughput of any temporary gasoline storage vessels used exclusively for providing gasoline to employees of the tank operator and local emergency authorities and responders will not be counted toward the annual or thirty (30) day average throughput for purposes of determining the applicability of control requirements under LAC 33:III.2131. This subparagraph applies only to gasoline provided to employees at or below the operator's cost. This subparagraph does not exempt the operator from any other applicable regulatory requirements, specifically including, but not limited to, the spill prevention and control requirements of the Louisiana Water Quality Regulations (LAC 33: Part IX).

e. LAC 33:III.507.J.2 provides that an upset condition constitutes an affirmative defense to an action brought for noncompliance with technology-based emissions limitations. LAC 33:III.507.J.2.d requires the permittee to notify the Department no later than two (2) working days after the time emissions limitations were exceeded due to the upset. Because of the circumstances caused by the Hurricane and the need to apply facility resources to quickly repair and correct conditions caused by the upset, the Department extends the notification requirement referenced above to seven (7) days.

f. The Department authorizes the use of temporary portable emergency internal combustion engines, including, but not limited to, electrical power generators, firewater pumps, and air compressors, and the associated fuel storage tank, until such time as normal operations are restored or until the expiration of this Order, whichever is earlier.

i) The owner/operator shall notify the Office of Environmental Services, Air Permits Division by no later than September 8, 2008, that operation of temporary portable combustion engines has occurred or is anticipated.

ii) Emergency engines shall be fueled by natural gas, gasoline, diesel, or fuel oil that contains less than 0.5 weight percent sulfur.

iii) Emergency engines shall comply with all *applicable* requirements of 40 CFR 60, Subpart IIII–Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines; 40 CFR 60, Subpart JJJJ–Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines; and 40 CFR 63, Subpart ZZZZ–National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

iv) Each facility subject to LAC 33:III.919 shall include emissions from all such emergency engines in its annual emissions statement.

v) For each temporary emergency engine, the owner/operator shall record the date the unit is delivered; its make, model, and manufacturer's rated horsepower; the fuel type; total operating time; and the date the unit was removed from the site. These records shall be kept on-site and available for inspection by the Office of Environmental Compliance, Surveillance Division and reported to the Office of Environmental Services, Air Permits Division by no later than thirty days after the expiration of this Order.

g. For permitted internal combustion engines operated in direct response to the Hurricane, including, but not limited to, electrical power generators, firewater pumps, and air compressors, the Department suspends any limitations on operating time imposed by the applicable permit until such time as normal operations are restored or until the expiration of this Order, whichever is earlier. Emissions from the operation of such engines operated pursuant to this Order shall not count toward applicable ton per year limitations. All other provisions applicable to the engines shall continue to apply.

i) The owner/operator shall notify the Office of Environmental Services, Air Permits Division by no later than September 8, 2008, that operation of

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permitted internal combustion engines in excess of permitted limits has occurred or is anticipated. Relevant emission point and permit numbers should be included in this correspondence.

ii) A report summarizing the operating time of permitted internal combustion engines in direct response to the Hurricane and the resultant criteria and toxic air pollutant emissions shall be submitted to the Office of Environmental Services, Air Permits Division by no later than thirty days after the expiration of this Order.

h. The Department suspends applicable limitations on throughput and emissions imposed on fuel loading racks by air quality permits through the expiration of this Order in order to maximize fuel availability in response to the Hurricane. Emissions from loading operations during this period shall not count toward applicable ton per year limitations.

i) The owner/operator shall notify the Office of Environmental Services, Air Permits Division by no later than September 8, 2008, that throughput in excess of permitted limits has occurred or is anticipated. Relevant emission point and permit numbers should be included in this correspondence.

ii) A report summarizing the throughput in excess of permitted limits and the resultant criteria and toxic air pollutant emissions shall be submitted to the Office of Environmental Services, Air Permits Division by no later thirty days after the expiration of this Order.

§ 6. Asbestos Clean-up

a. Asbestos clean-up shall be conducted in accordance with the Debris Management Plan. The Department waives the requirement for prior notification for emergency demolition or emergency cleanup of asbestos-containing material that is structurally unsound and in danger of imminent collapse resulting from the Hurricane. Within one (1) business day of commencing such demolition or cleanup, however, the person responsible for such work being undertaken by order of state or local government shall notify the Department in writing. The notification shall be submitted on the Asbestos

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Notification of Demolition or Renovation Form AAC-2, which may be found at <http://www.deq.louisiana.gov/portal/tabid/2883/Default.aspx>. The procedures in LAC 33:III.5151 (demolition/renovation) and LAC 33:III.Chapter 27 (accreditation and training requirements) for handling asbestos-containing material shall be complied with during demolition, cleanup, transportation, and disposal, except as otherwise provided herein. Construction and demolition debris generated from residential structures of four units or less that are subject to a government ordered demolition (if ordered) and that are assumed to contain potential asbestos-containing waste material shall be disposed of in a permitted Type I or II landfill. The Department will provide a written response to any request for authorization for a Type I or II landfill to dispose of asbestos containing waste material. Burning and grinding of asbestos-containing material is prohibited.

b. The Department waives the requirement pursuant to LAC 33:III.2799.E.2.b.ii, that applicants receiving training from providers not recognized by the State of Louisiana also submit proof of training in current Louisiana asbestos regulations (see LAC 33:III.2799.F.5.g).

c. The Department waives the requirement pursuant to LAC 33:III.2799.F.5.c.i that recognized asbestos Training Providers give the Department notice at least five (5) days prior to class commencement. (Notification must be made at least three (3) days prior to a course when only the state regulations are to be taught.) Notice shall be provided to the Department within twenty-four (24) hours of class commencement.

d. Local education agencies and state government may make emergency use of a building as a school or state building. The agency making use of the building may request an extension of the deadline to inspect the building within four (4) months of the decision to use the building pursuant to LAC 33:III.2707.A.2.

e. The Department waives the requirement pursuant to LAC 33:III.2723.A.2 that the local education agency or state government must submit a management plan prior to any building's use as a school or state building. A management plan shall be submitted within six (6) months of the initial use of the building.

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f. In addition to the qualifications established by LAC 33:III.2799.D.3, the Department may accredit as an "abatement project designer" any individual who:

i) has a Bachelor of Science in a related scientific field with five (5) years experience as a Contractor/Supervisor working under the direction of a Louisiana Accredited Project Designer, planning and implementing asbestos abatement projects;

ii) has at least ten (10) years experience as a Contractor/Supervisor working under the direction of a Louisiana Accredited project Designer, planning and implementing asbestos abatement projects; and

iii) has completed an application developed by the Department, and received signatures from two (2) Louisiana accredited Project Designers indicating that the applicant has the knowledge and skills to perform this type of work.

g. The fee charged for the Emergency Processing of Worker Accreditation for Asbestos (i.e., LAC 33:III.223, Fee #2070) shall be reduced to \$66.00 (i.e., the same fee as for normal processing, Fee #2060).

h. The duration of worker, contractor/supervisor, and inspector initial and refresher training courses is specified in numbers of days. A day of training may equal nine or ten consecutive hours, including breaks and lunch. For example, a 32-hour worker class may be taught in 9-hour days, reducing the class time on the fourth day by six (6) hours, a 40-hour contractor/supervisor class may be taught in 10-hour days, reducing the class time to four (4) days, and a 24-hour inspector class may be taught in 10-hour days, reducing the class time to 2.5 days.

i. The fee charged for the Emergency processing of Asbestos Notification of Demolition and Renovation Form AAC-2 (i.e. LAC 33:III.223, Fee code # 2030) shall be reduced to \$66 (sixty-six dollars) for hurricane related demolition of residential structures of four (4) units or less, subject to a government ordered demolition.

The Department shall generate a single Asbestos Disposal Verification Form ("ADVF") per day, per landfill, per contractor for use with multiple loads of C&D debris that contains asbestos containing waste material, notwithstanding any provision to the

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contrary in LAC 33:III.5151.F.2.g. The Department will also generate a blank "Addendum to ADVF for Transportation and Disposal of AWCM," which will accompany the ADVF and which is to be completed and signed by the contractor and landfill operator. Detailed instructions and a sample Addendum are available on the Department's Website at <http://www.deq.louisiana.gov/portal/tabid/2885/Default.aspx> under ****Special Interest - Hurricane Related: Please Take Note**** or by contacting the Permit Support Services Division, Notifications and Accreditations Section, at 225-219-0789.

§ 7. Underground Storage Tanks

Before placing any hurricane impacted Underground Storage Tank (UST) system back in operation, and no later than ninety (90) days after hurricane related conditions permit, the owner and/or operator shall perform an emergency evaluation of the UST system. The evaluation shall consist of, at a minimum, a general inspection of the UST system, followed by performing the start up protocol contained in Appendix F, "Plan For Evaluating Underground Storage Tank Sites Impacted by Hurricane Gustav." Before placing fuel into any UST system that has been damaged or has sustained a release, the owner/operator must repair or replace the UST system, perform precision tank and line tightness tests and leak detection system tests, and provide a fully functional corrosion control system.

During the time that the UST system is not accessible due to conditions resulting from the Hurricane, the owner/operator of the UST system is relieved of the requirements for release detection, corrosion protection, and inventory control. Each owner/operator shall report any suspected UST releases to the Department within seven (7) days of gaining knowledge of the suspected release, unless an emergency condition makes it impossible for the owner/operator to do so, in which case the owner/operator shall report the suspected release to the Department as soon as he/she is able. All recordkeeping requirements for inoperable systems are suspended during the time of this Order. During the time of this Order, in the areas affected by the Hurricane, non-compliance with release detection, corrosion protection, and inventory

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control for UST owners and operators will not constitute non-compliance for purposes of the deductibles enumerated in La. R.S. 30:2195.10.

§ 8. Special Waste (Reuse and Recycle)

Every effort should be made to minimize the disposal of reusable and recyclable material in landfills as noted in the Debris Management Plan (Appendix D). Appendix G lists special waste from specific sources (households, businesses, schools, public buildings, automobiles and boats) and references the FEMA Debris Plan, which provides information intended to assist operators of solid waste facilities, recycling centers, scrap metal dealer, local governments, and contractors in handling of certain debris from the Emergency Areas.

§9. Public Notice and Public Participation Procedures Regarding Proposed Permit Actions

Any public comment period ending between August 29, 2008 and September 15, 2008 for facilities located in the parishes of the emergency declaration are hereby extended through September 26, 2008.

Public Hearings scheduled in the Emergency Areas will be evaluated on a case by case basis depending on local conditions.

Updates will be provided on the Department's website and press releases will be prepared if a public hearing is postponed.

Appendix H provides special procedures for public notice and public participation regarding proposed permit actions in the Emergency Areas that may be activated in the event of prolonged or extensive interruption of newspaper services in the impacted areas. These procedures for comment period extension and revised public notice requirements may be revised after a full impact assessment is completed.

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§ 10. Records Management

Hard copy or electronic copies of files associated with environmental issues for your facility may be available at the Department. Files destroyed by the Hurricane can be obtained by the Responsible Persons for your system from the Department free of charge. Please contact Records Management at (225) 219-3172 or online at <http://www.deq.louisiana.gov/pubRecords/>.

§ 11. General Conditions

a. This Order does not convey any property rights or any rights or privileges other than those specified in this Order.

b. This Order only serves as relief for the duration of this Order from the regulatory and proprietary requirements of the Department, and does not provide relief from the requirements of other federal, state, and local agencies. This Order therefore does not negate the need for the property owner or facility operator to obtain any other required permits or authorizations, nor from the need to comply with all the requirements of those agencies.

§ 12. General Limitations

The Department issues this Order solely to address the emergency created by the Hurricane. This Order shall not be construed to authorize any activity within the jurisdiction of the Department except in accordance with the express terms of this Order. Under no circumstances shall anything contained in this Order be construed to authorize the repair, replacement, or reconstruction of any type of unauthorized or illegal structure, habitable or otherwise.

§ 13. Other Authorizations Required

Nothing in this Order shall eliminate the necessity for obtaining any other federal, state, or local permits or other authorizations that may be required.

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§ 14. Extension of Time to Comply with Specified Deadlines

For facilities regulated by the Department in the Emergency Area, this Order extends the time for a period of thirty (30) days to comply with the following specified deadlines that occur between August 31, 2008, and the expiration of this Order:

- a. The time deadlines to conduct or report periodic monitoring required by permits, other authorizations, enforcement actions, or settlement agreements, except for monitoring required by air permits issued under Title IV or V of the Clean Air Act or under the PSD program;
- b. The time deadlines to file an application for renewal of an existing permit, except for air permits issued under Title V of the Clean Air Act.

§ 15. Completion of Authorized Activities

All activities authorized under this Order must be commenced before the expiration of this Order unless otherwise provided in an authorization or permit. The deadline for commencement under any authorization or permit issued under this Order may be extended on a showing that contractors or supplies are not available to commence the work, or if additional time is needed to obtain any required authorization from the Federal Emergency Management Agency, the U.S. Army Corps of Engineers, or other local, state, or federal agencies.

§ 16. Amendments

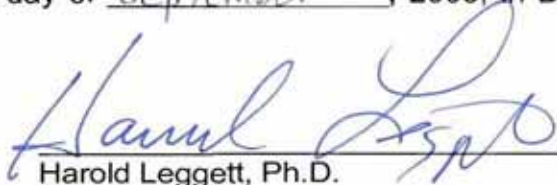
This Order may be amended as required to abate the emergency.

§ 17. Expiration Date

This Declaration of Emergency and Administrative Order shall take effect immediately upon execution by the Secretary of the Department, and shall expire sixty (60) days from the date of execution set forth below, unless modified or extended by further order.

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DONE AND ORDERED on this 6th day of September, 2008, in Baton Rouge, Louisiana.



Harold Leggett, Ph.D.
Secretary

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APPENDIX A

GUIDANCE PROTOCOL FOR SANITARY WASTEWATER TREATMENT SYSTEMS

The following protocol is intended to assist operators of sanitary wastewater treatment systems in the Emergency Area in start up and operation.

1. Access

Entrance to the treatment plant should be considered only after flood waters have receded enough to allow safe operation of the treatment plant including the safe conditions for staff. Accessibility to treatment plants in restricted areas may need to be cleared with the Office of Emergency Preparedness. Contact the local sheriff if assistance in gaining access to the treatment plant is required. The use of sound personal protective equipment for safety in unsanitary or unsafe conditions is required. Early return to compliant operation minimizes long-term problems within the entire wastewater system.

2. Power Supply

For use of generator power, arrange for a reliable and continual fuel source. Contact the Department of Agriculture if assistance in obtaining fuel for power generation at your treatment plant is needed. If no generation is available and you must wait for electrical providers; consider notification to residents of the effect on collection lines. If removal of clean out plugs is needed to prevent back up into homes, notify affected customers warning them to remain clear of these areas. If pump trucks are used, LDEQ can advise of locations to dispose of the pumped sewage.

3. Start Up

Once it is safe, re-power the treatment system, aerators and pumps. The primary goal is to remove sanitary wastewater from contact with humans, while making every effort to do so in a manner that is practical and least impacting on the environment. Activate disinfection units and maintain them. Initial effluent will likely be poorly treated and of a very poor quality. Adequate disinfection will be important to protect human health downstream of the discharge. If the system has been down and/or without power for an extended period of time, resident bacteria used in the treatment process may need to be re-established. Consider reseedling the system with activated sludge from operating aerated treatment plants. Several treatment plants are available for use in reseedling. Contact the Department's Water Permits Division, Melvin "Mitch" Mitchell, 225-219-3013 (email) mitch.mitchell@la.gov for information regarding system seed sources.

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4. Monitoring

Watch plant operations carefully to confirm it is functioning properly. Ensure that lift stations within the collection system are functional. Without functioning lift stations, sewage is not being removed from residences and sent for treatment. Visually observe effluent to maximize treatment effectiveness in the short term. If simple tools and/or tests are available to diagnose the plant's operational status ("sludge judge," settle-o-meter, dissolved oxygen meters, BOD analyses) use them frequently. If your plant is discharging poorly treated sewage, consider the impacts to persons, fish and wildlife downstream, including the possibility that drinking water intakes may be located downstream of your effluent. Notification to downstream users may be necessary to protect human health. Sample and analyze your effluent per LPDES requirements as soon as you are able.

5. Notifications and Documentation

Discharges that result in emergency conditions (threat to human health and the environment) must be reported immediately (1-877-925-6595). Discharges that result in emergency conditions (threat to human health and the environment) may require notification to affected persons. Report to the Department any discharges that interfere with downstream uses, such as swimming or drinking water sources or if fish kills occur. Discharge Monitoring Reports (per permit requirements) should be used to notify the Department of non-emergency conditions. Notification to sewage users may be necessary if problem with the system prevents removal of sewage from residences (or other human contact) on an on-going basis. Notification to downstream users may be necessary to protect human health. Notify the Local Office of Emergency Preparedness when hurricane damage repairs are known – Federal Emergency Management Agency (FEMA) may be able to help with costs associated with hurricane damage.

A permittee who wishes to establish the affirmative defense of upset must document the cause of the upset, that the facility was being properly operated at the time of the upset, that notice of the upset that exceeded effluent limitations was submitted to the DEQ and that the permittee took all reasonable steps to minimize or prevent the likelihood of adversely affecting human health or the environment.

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APPENDIX B

TEMPORARY HOUSING SITE SELECTION

Initial Screening

Sanitary Wastewater

- Attempts must be made to route sanitary wastewater to an existing wastewater collection system or wastewater treatment system whenever feasible. This option requires no permitting action or approval from the Department. However, the primary FEMA contractor shall notify the Department, in writing, of any such discharge to an existing wastewater collection system.
- If a point source discharge is to be made into waters of the state, identify the effluent route to the first named waterbody (a waterbody that is readily recognizable).
- Avoid discharge into a drainage system that goes through or next to a sensitive area. Sensitive areas include, but are not limited to: drainage behind a subdivision, school, or park; drainage that routes the effluent through a private pond or private property; or discharge into a designated outstanding natural resource waterbody.
- If feasible, route effluent to the Mississippi River, or through local drainage to the Mississippi River. If not possible, route effluent directly into the largest waterbody in the vicinity, or into the waterbody's drainage system as close as possible to the waterbody.
- Mobile homes will be rated at 250 gallons per day per mobile home. Travel trailers will be rated at 125 gallons per day per trailer. If washing machines will be made available outside of the mobile home or travel trailer (in a washateria) 800 gallons per day per washing machine will be factored into the allowable capacity. Any combination of the above should be utilized to determine overall gallons per day per site.
- All single point source discharge into waters of the state should be limited to 100,000 gallons per day in order to qualify for rapid coverage under the Louisiana Pollutant Discharge Elimination System General Sanitary Permit. Discharges in exceedence of 100,000 gallons per day will be evaluated by the Department on a case-by-case basis in compliance with water quality standards of the receiving waterbody.

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Waste

- If feasible, select site that is an existing development, such as, an existing mobile home park, or a site that has existing infrastructure that can be utilized.
- Research existing databases and make on-site physical observations for former municipal waste sites, abandoned hazardous waste sites, former underground storage tank remediation sites, etc. These areas should be avoided as locations for staging or locating temporary housing.

Notification after Initial Screening

- After the initial screening, notify the Department and provide the following information:
 - Location – site name, physical location (911 address if available) and coordinates (i.e. latitude and longitude) shall be provided.
 - Identify the method of wastewater treatment or management. Notification must be made of connection to an existing wastewater collection system or treatment system (provide name of system); collection for off-site disposal (provide disposal name/location); or treatment and discharge to surface waters of the state.
 - If proposal is to discharge to surface waters from a treatment system that did not previously discharge at the proposed location, provide an estimated design flow (based on numbers above) and the effluent discharge route to first named waterbody. (Ex. unnamed ditch, to LA Hwy 19 ditch, to unnamed creek, to White's Bayou, to the Comite River.)
- Notification must be made to the Department at P. O. Box 4313, Baton Rouge, LA 70821-4313 or by fax at (225)219-3309 to the attention of the Administrator of the Water Permits Division.
- Following notification as provided in this section, the Department will provide comments on the proposed site.

Storm Water Permit Prior to Construction

- If dirt work is going to be required at the site, a stormwater general permit for construction may be required.
- If the area to be developed is less than one (1) acre, coverage under a stormwater general permit is not required.

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- If the area to be developed is at least one (1) acre but less than five (5) acres, coverage under Construction General Permit LAR200000 will be required. A Notice of Intent (NOI) is not required to obtain coverage under this permit. However, a storm water pollution prevention plan (SWPPP) must be prepared and implemented at the time construction begins. A copy of the permit is available at <http://www.deq.louisiana.gov/portal/Portals/0/permits/lpdes/LAR200000.pdf>. A Notice of Termination (NOT) is required when construction is complete.
- If the area to be developed is five (5) acres or greater, coverage under the Construction General Permit, LAR100000, will be required. Submittal of a NOI (CSW-S) is required prior to commencement of construction. The NOI can be found at <http://www.deq.louisiana.gov/portal/Default.aspx?tabid=1837>. A copy of the general permit can be found at <http://www.deq.louisiana.gov/portal/Portals/0/permits/lpdes/LAR100000.pdf>. Submission of an NOT is required when construction is complete.
- Close attention must be given to the Historic Preservation sections of each of the construction general permits for any construction at previously undeveloped sites.
- Coverage under the construction general permits is necessary prior to construction. However, authorization to discharge as described is not required before construction, but is required before the discharge begins.

Registration for Authorization for Direct Discharges

- For discharges totaling less than 100,000 gallons per day, a Notice of Intent (NOI), form WPS-G, must be submitted to the Department at the above address. The NOI is available at <http://www.deq.louisiana.gov/portal/Default.aspx?tabid=1837>. Copies of LPDES Sanitary General Permits are available on the Department's web site at <http://www.deq.louisiana.gov/portal/Default.aspx?tabid=245>.
- Proposed discharges greater than 100,000 and particular discharges going directly into the Mississippi may be granted authorization to discharge under an Administrative Order or an individual LPDES permit on a case-by-case basis. If an Administrative Order is granted, application for a permit shall be made to the Department within thirty (30) days. Please contact the Department for additional information if this applies to your site.
- Contact for coverage under a Sanitary General Permit can be made to Tom Killeen, Manager Municipal and General Permits Section @ (225) 219-3181 or by e-mail at tom.killeen@la.gov.

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- For FEMA temporary housing sites, the primary FEMA contractor shall apply for and be the responsible entity for the permit, operation, maintenance and reporting requirements to LDEQ.

Additional Recommendations for the Housing Sites

Water

- Wastewater treatment plants (WWTP) must be operated by a certified operator.
- WWTP's must be properly operated and maintained at all times.
- Disinfection of effluent must be provided.
- Permittee should implement a program to inform residents of things that might be harmful to the WWTP such as the introduction of grease or large amounts of household chemicals to the treatment plant.

Waste

- Provide for collection and disposal of solid waste.
- Provisions should be made for proper disposal of household hazardous waste during the operation of the facility and as residents leave the facility.
- It is recommended that the residents be informed on the benefits and requirements of proper disposal of solid waste and household hazardous waste.

Recycling

- Whenever feasible, provide for recycling, such as, providing a recycling center on site with appropriate recycle containers.
- Inform residents on the proper procedures for recycling household materials.
- Recycling incentives for residents can prove beneficial.

Open Burning

- Open burning at these sites should be prohibited. This does not include charcoal or gas grills.

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Site Closure

- Once all the residents have left, the site must be closed.
- All solid and household hazardous waste shall be removed and properly disposed.
- If a WWTP was used for treatment of sanitary wastewater, it shall be removed. A request for termination of coverage under the permit or Administrative Order issued for coverage must be submitted to the Department.
- Notification of closure must be made to the Department through SPOC (225-219-3640 or Toll Free 1-888-763-5424). The Department will approve the site for closure.

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APPENDIX C

REQUIREMENTS FOR THE CONDITIONAL AUTHORIZATION OF DISCHARGES OF GRAY WATER TO SURFACE WATERS OF THE STATE OF LOUISIANA

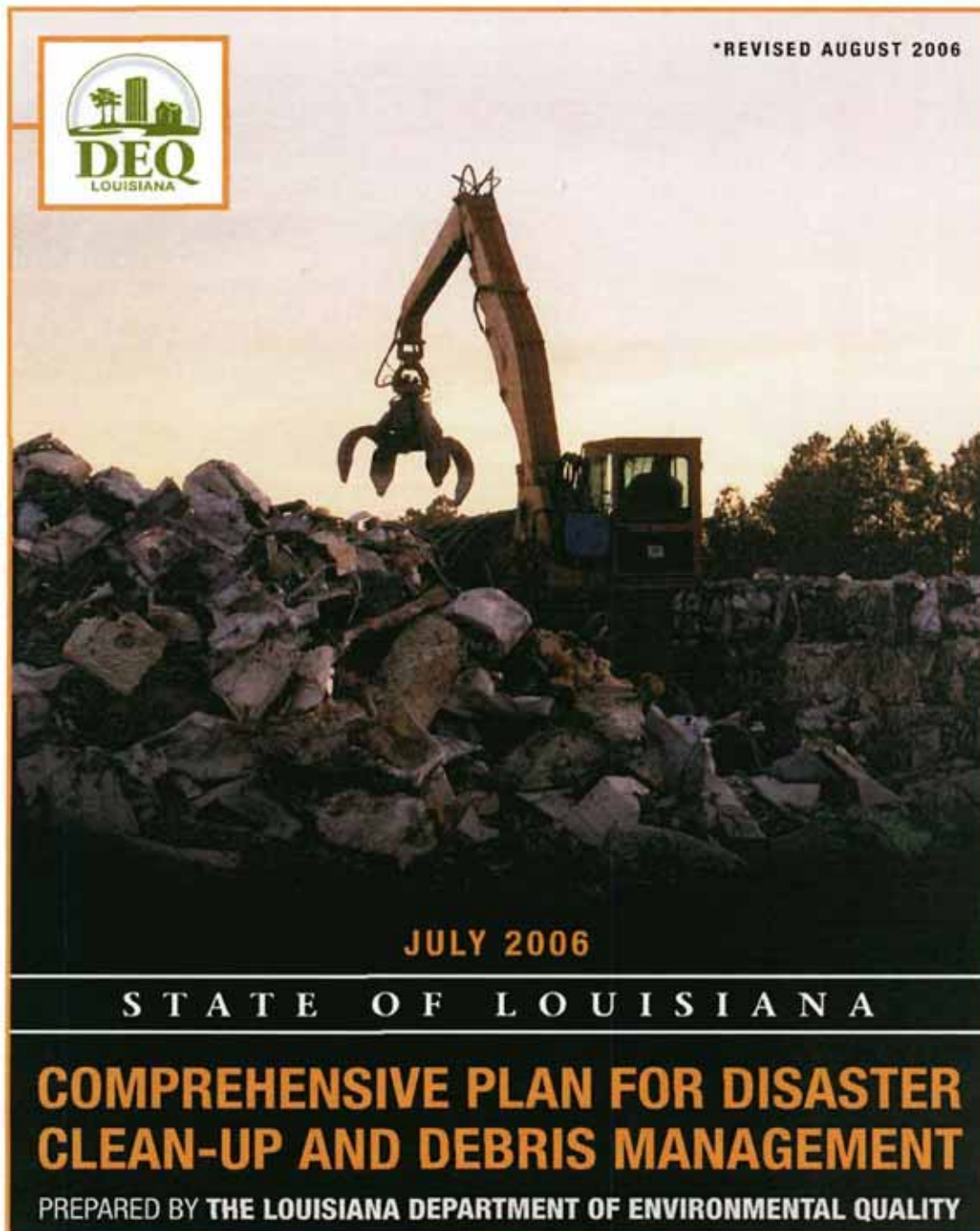
For purposes of these requirements, gray water shall be defined as wastewaters from all fixtures except toilets, including but not limited to wash waters from kitchen, bathroom, and laundry sinks, tubs, and washers.

Unless the Department gives written notice to the contrary, gray water discharges to surface waters of the State, within the Emergency Areas, are hereby authorized, if the following requirements are met:

- Attempts must be made to route gray water to an existing wastewater collection system or wastewater treatment system whenever possible.
- Discharges of gray water shall be made directly into a ditch, drainage or waterbody where feasible.
- Human contact with gray water discharges shall be avoided to the greatest extent possible.
- Surface application of gray water shall not be used for irrigation of food plants.
- The discharge of gray water may not contain human waste or any chemicals derived from activities such as cleaning car parts, washing greasy or oily rags, disposing of waste solutions, or soiled or infectious garments.
- The application of gray water shall be managed to minimize standing water on the ground surface.
- Any gray water storage tank must be covered to restrict access and to eliminate habitat for mosquitoes or other vectors.

APPENDIX D

Hurricane Debris Management Plan



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Purpose

The purpose of the Comprehensive Plan for Disaster Clean-up and Debris Management is to establish a framework to facilitate the proper management of debris generated by natural disasters within the state. The goal is to facilitate a reasonable, efficient and prompt recovery from such disasters and be protective of human health and the environment. The plan includes flexible and innovative approaches to address disaster-generated debris issues. It adheres to the Louisiana Department of Environmental Quality's (LDEQ) mission of protecting human health and the environment to the fullest extent possible under the circumstances. The plan allows LDEQ the flexibility to consider, approve or disapprove reasonable requests for authorizations, variances, and waivers as needed for rapid and environmentally sound waste management, recycling, and disposal. A primary objective of the plan is to conserve landfill capacity and to protect natural resources to the maximum extent practicable.

Pursuant to the laws of the state of Louisiana, the Secretary of the LDEQ is granted the authority to declare an emergency upon receipt of evidence of an incident that requires immediate action to prevent irreparable damage to the environment and serious threats to life or safety. Upon declaring that an emergency exists, the Secretary may issue such permits, variances or other orders as necessary to respond to the emergency, and such orders are effective immediately. With the declaration of an emergency, the Secretary issues an administrative order which provides specific measures authorized within the timeframe of the emergency. Those specific measures contained in the emergency order serve as relief for the duration of the order from the regulatory and proprietary requirements of the LDEQ. However, the measures do not provide relief from the requirements of other federal, state, and local agencies.

Thus, the regulatory flexibility to expeditiously manage disaster-generated debris in the manner set forth in this plan is authorized upon issuance of an Emergency Declaration and Administrative Order by the LDEQ Secretary. Moreover, while this plan is consistent with state and federal law, it does not supersede any ordinance adopted by a local governing authority.

Background

Louisiana, along with its Gulf Coast neighbors, experienced an unprecedented disaster when Hurricane Katrina came ashore on August 29, 2005. Along with the human tragedies, the storm left in its wake more than 22 million tons or 55 million cubic yards of debris, including thousands of orphan drums of unknown origin and content, over 350 thousand flooded and abandoned cars, over 60 thousand damaged vessels, over 1.5 million units of white goods, over 500 thousand units of electronic goods, 140 to 160 thousand flooded homes and recovery problems never before faced by the citizens of this state or country. On September 23-24, 2005, Hurricane Rita struck the southwest part of the state, leaving another 2.4 million tons or 6 million cubic yards of debris, flooded cars, damaged vessels, orphan drums and thousands of electronic and white goods. The storm surge from Hurricane Rita devastated the parishes of Cameron, Vermilion and Calcasieu and re-flooded parts of St. Bernard Parish and the Lower 9th Ward in Orleans Parish.

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Hurricane Katrina's wrath was felt in Louisiana, Mississippi and Alabama. Of the combined damage from the three states, 75 percent of the destruction was in Louisiana.



The magnitude of the tasks that faced the state after such destruction made it apparent that a proactive posture is needed to prepare for future catastrophic events. This Comprehensive Plan for Disaster Clean-up and Debris Management documents some of the lessons learned and extends beyond those lessons to allow this state to formulate a plan that allows it to address future disasters in a cohesive, organized and efficient manner, while ensuring protection of public health and the environment.

The removal and proper management of debris after these two hurricanes was and continues to be a critical element of the recovery efforts.¹ Without debris removal, there can be little rebuilding and repopulating. All kinds of debris, household contents, houses, cars, vessels, trees, white goods, electronics and more must be removed from the streets in order for citizens to return to their homes and businesses. Many homes and other structures need to be completely demolished to allow the recovery to continue.

The LDEQ prepared a Hurricane Katrina Debris Management Plan which was released on September 28, 2005, and revised on October 14, 2005. Additionally during the 2006 Regular Session of the Louisiana Legislature, Senate Bill 583 (SB 583, Act 662) was enacted. SB 583 directs the LDEQ to develop and implement a comprehensive debris management plan for certain debris generated by natural disasters. The bill states the goal of the comprehensive debris management plan is to "reuse and recycle material, including the removal of aluminum from debris, in an environmentally beneficial manner and to divert debris from disposal in landfills to the maximum extent practical and efficient which is protective of human health and the environment." Among other things, SB 583 dictates the use of the following debris management practices, in order of priority, to the extent they are "appropriate, practical, efficient, timely and have available funding: recycling and composting; weight reduction; volume reduction; incineration or co-generation; and land disposal."

The LDEQ, through this plan, utilizes portions of its 2005 Debris Management Plan in conjunction with the dictates of SB 583. In other words, this plan builds upon LDEQ's existing plan and is intended to be a living document. As such, it will be amended, as necessary, to address specific challenges as they arise.

¹ Hurricane Katrina generated more than 22 million tons of C&D debris. The largest landfill in Louisiana typically processes about one million tons a year.

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Recycling and Beneficial Use

This plan is designed to encompass LDEQ's goal of reduction, conservation and management relative to debris management. The plan promotes reduction of the debris stream utilizing chipping, grinding, recycling or other methodologies. It promotes conservation and management by ensuring that adequate capacity exists for disposal and management of disaster-generated debris, including that generated by redevelopment and repopulation by businesses and residents. The plan also encompasses the legislative goal to reduce debris 50% by volume and 50% by weight prior to disposal in a landfill.

Local governments should identify sites where recycling and beneficial use options may be utilized. Local governments should have standby contracts to provide for the oversight, implementation and operation of recycling and beneficial use projects associated with disaster-generated debris activities. The standby contracts should include provisions to ensure that marketing outlets are available to receive and process the material resulting from the recycling and beneficial use activities. The recycling and beneficial use options provided below and later in this document will contribute to the plan goals.

Bricks and concrete removed from homes during the demolition process may be recycled utilizing stone crushing equipment. Equipment utilized for this purpose shall be operated in accordance with manufacturers' instructions and any applicable LDEQ correspondence or guidance.

Debris Management Definitions²

Construction and Demolition Debris –

Non-hazardous waste generally considered not water-soluble, including but not limited to:

- Metal, concrete, brick, asphalt, roofing materials (shingles, sheet rock, plaster), or lumber from a construction or demolition project
- Furniture, carpet, painted or stained lumber contained in the demolished buildings
- The incidental mixture of construction and demolition debris with asbestos-contaminated waste. (i.e., incidental asbestos-contaminated debris that cannot be extracted from the demolition debris)
- Yard Trash (vegetative matter resulting from landscaping and yard maintenance, including tree and shrubbery leaves and limbs, grass clippings, and flowers.)

Debris Management Site – is a location that has been identified by the local government and evaluated and approved by LDEQ for the purposes of staging, reduction or final disposal of disaster-generated debris.

The activities conducted at these sites might include:

- Woodwaste Chipping and Grinding and/or Composting Woodwaste Burning Operations
- Construction and Demolition Debris Staging or Disposal
- Staging of Vessels and Vehicles
- Staging of Special Debris (Munitions and Ordnance, Household Hazardous Materials, Liquefied Petroleum Gas Tanks, Electronic Goods, White Goods and Tires)

² These definitions apply to debris management activities related specifically to the emergency response activities associated with the aftermath of a natural disaster (e.g. a hurricane, tornado, etc.)

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Vegetative Debris – is green woody material consisting of trees, limbs, and branches, generated by the clearing of downed and damaged trees. It does not include processed wood or other lumber used in construction.

Debris Management Sites

In general, local governments will need to determine appropriate sites for the following temporary activities: staging and transfer of construction and demolition (C&D) debris; staging of vehicles and vessels; staging of household hazardous waste; chipping, grinding and/or burning of vegetative debris; composting of vegetative debris; staging of munitions and ordnances; staging of white goods, electronic goods and other consumer items; and recycling and beneficial use activities. Use of a site as a permanent disposal site may also be considered.

The sites that were approved by LDEQ for use after Hurricanes Katrina and Rita and which met all applicable monitoring and operational requirements, do not need to obtain prior approval from LDEQ for use following a future disaster provided there have been no significant changes in surrounding land use and potential receptors, and the site's authorization to operate was not rescinded or revoked by LDEQ as a result of non-compliant activity during its previous use. The sites must still comply with the criteria listed in the section below. The sites will be automatically approved and available for use by local and parish governments to manage disaster-generated debris. This approval is **ONLY** for the purposes for which they were previously approved. For instance, if a site was approved for staging debris, it is automatically approved for staging debris for future disasters, but it **IS NOT** approved for another use such as chipping and burning of vegetative debris. If a site is reactivated, the local governing authority shall notify LDEQ within 5 days of its reactivation. LDEQ will notify the local governing authority if a site cannot be approved for use as previously approved.

Finding the Right Location

When selecting a proposed debris management site, the local government should consider the following:

- What is the proposed use for this site?
- Is it easily accessible?
- Is it removed from obstructions such as power lines and pipelines?
- Is the site considered to be a wetland area, as defined by the U.S. Army Corps of Engineers?
- Is the general site topography conducive to the activity that will be conducted there?
- Are there nearby residences and/or businesses that will be inconvenienced or adversely affected by use of this site?
- Is the size sufficient for its intended use?
- Is the soil type suitable for its intended use?
- Is the site a previously authorized location that is being reactivated for use?
- Is the site located near water bodies such as rivers, lakes or streams and their proximity to occupied dwellings?
- What is its proximity to the impacted area?

In addition to the criteria listed above, LDEQ will evaluate proposed burn sites based on their proximity to water bodies such as rivers, lakes or streams, and occupied dwellings.

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Site Approval

In order for a location to be considered by the LDEQ as a debris management site, the local government must submit an Emergency Disaster Cleanup Site Request Form to LDEQ. The form is available on LDEQ's website at <http://www.deq.louisiana.gov/portal/tabid/259/Default.aspx>. Authorizations may be issued prior to or following a site inspection by LDEQ personnel for staging areas to be used for temporary storage and chipping, grinding or burning of disaster-generated debris. Sites that have been identified by local government and evaluated and authorized by LDEQ for use in response to a hurricane disaster will be provided on LDEQ's website. If the site is approved, LDEQ will inform the local government and will document the approval, usually by letter. The letter will also contain any restrictions or operational conditions that must be adhered to relative to the site. Operational conditions will be outlined in an Interim Operational Plan.

Site Closure

Each temporary debris management site with the exception of authorized vegetative debris and C&D debris disposal sites, and sites where ash is land-applied, will eventually to the extent practicable, have disaster-related debris cleared and be restored to its previous condition and use.³ Closure must be in accordance with approved LDEQ practices and/or the Interim Operational Plan. Sampling of soil and/or ash that is left at the site may be required by the LDEQ. The local governing authority will be required to take necessary steps to ensure that no environmental contamination is left on-site. Monitoring and/or remediation of a site must be coordinated through the LDEQ's Office of Environmental Assessment. Closure should be accomplished within the time limits established by the LDEQ.

C&D Debris Management

LDEQ recognizes that decisions on the disposition of wastes and debris need to be made at the collection point. Use of best professional judgment will be necessary to determine the ultimate disposition of collected material. Contractors chosen by the local governing authority, or by state or federal agencies, should possess knowledge of applicable regulations and of any LDEQ Declarations of Emergency and Administrative Order in order to correctly route waste streams to appropriate sites and/or facilities.

C&D Debris Staging/Transfer

LDEQ expects a considerable amount of the disaster-generated C&D debris to be staged at temporary sites and transported to permitted Type III facilities or to be placed into LDEQ authorized C&D debris disposal sites. Materials approved for receipt at these facilities include roof shingles, roofing materials, carpet, insulation, wallboard, treated and painted lumber, etc.

Site operations will comply with an Interim Operational Plan provided by the LDEQ. It is the responsibility of the local government to provide this Interim Operational Plan to any entity that may be charged with operation of the site.

Arrangements should be made to segregate unsuitable materials such as household garbage, white goods, asbestos containing materials (ACMs), and household hazardous waste. These materials should be placed in containers and transported to facilities that are approved for their receipt. If more than de minimus amounts of these wastes are present, the waste should be handled in a manner consistent with the most stringent management technique necessary for the waste stream.

C&D Debris Grinding

In order to contribute to the reduction in volume of C&D debris that may be destined for disposal,

³ If the site is used for C&D debris disposal and the debris will remain in place, site closure shall be in accordance with the Interim Plan and specific tasks such as deed recordation must be accomplished. If the site is used for vegetative debris burning, the ash generated may be land applied.

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grinding of C&D debris may be proposed for utilization by the local government. LDEQ will endeavor to ensure that the location chosen for this activity is thoroughly evaluated to make any impacts as minimal as possible. Grinding of C&D debris will help ensure reduction in the volume of material to be hauled to landfills for ultimate disposal.

C&D debris grinding shall be performed in accordance with a plan that has been prepared by the local government and reviewed and approved by LDEQ. It is the responsibility of local government to provide the plan to any entity that may be charged with operation of the site. All equipment (grinders, chippers, air curtain burners) shall be operated in accordance with manufacturers' instructions and any applicable LDEQ permits or directives.

Local, state and federal partners associated with the C&D debris grinding operation will be advised of locations that have been approved for this purpose. All sites must be operated in accordance with the LDEQ-provided Interim Operational Plan or other LDEQ correspondence or guidance.

C&D Debris Burning

In order to contribute to the volume and weight reduction of C&D debris that may be destined for disposal, the burning of C&D debris may be proposed for utilization by the local government. As dictated by circumstances and contingent upon applicable local, state and federal requirements, occasions may arise where LDEQ will allow C&D debris to be burned. The burning of C&D debris may be considered on a case-by-case basis, after review of the specific circumstances of the emergency. Any burning must utilize equipment to reduce emissions if the LDEQ and respective local governing authority deem the use of equipment necessary to protect public health and the environment.

LDEQ will endeavor to ensure that the location chosen by the local governmental entity for this activity is thoroughly evaluated and deemed acceptable in order to minimize, to the greatest extent possible, any potential impacts to the environment. The burning of C&D debris shall be performed in accordance with a plan that has been prepared by the local government and reviewed and approved by the LDEQ. It is the responsibility of local government to provide the plan to any entity that may be charged with operation of the site. All equipment (grinders, chippers, air curtain pit burners) shall be operated in accordance with manufacturers' instructions and any applicable LDEQ permit.

Local, state and federal partners associated with the C&D burning operation will be advised of locations that have been approved for this purpose. All sites must be operated in accordance with the LDEQ-provided Interim Operational Plan or other LDEQ correspondence or guidance.

Ash generated as a result of burning of C&D debris must be analyzed to determine if contaminants are present that would render the material unsuitable for use as a soil amendment, or would render the material a hazardous waste. Disposal or use of this ash can occur ONLY AFTER review of analytical results by LDEQ.

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C&D Debris Disposal

To the extent possible and practicable, C&D debris will be disposed of in permitted C&D Debris Landfills. However, due to the devastation caused by a natural disaster, it may be necessary to allow accumulation and disposal of C&D debris at sites that are deemed appropriate but have not had time to go through the normal permitting process. LDEQ will evaluate requests by local governments and, if it is determined to be warranted for an efficient, expeditious and environmentally safe response, will allow disposal at authorized temporary C&D disposal sites. If approved, site operations must comply with the Interim Operational Plan provided by LDEQ.

Vegetative Debris Management

Every effort will be made to consolidate material from fallen trees and other vegetative debris in an attempt to beneficially use as much of this material as possible. Where local industries can utilize the wood for fuel, it will be used in that manner. Material will be chipped or otherwise reduced in volume to allow for composting or other beneficial reuse. This debris may be used in coastal restoration projects, as compost, or as fuel. It may not be disposed of in a landfill as the first option, but may be used as a component of the cover system for a landfill or a means for providing erosion control. The burning of vegetative debris may be allowed on a case-by-case basis if it is deemed to be necessary.

Vegetative Staging/Grinding/Chipping/Composting

Materials approved for receipt at these sites include vegetative debris such as yard waste, trees, limbs, stumps, branches and untreated or unpainted wood. Sites should be identified as chipping/grinding/composting sites and/or burn sites. All sites must be operated in accordance with the LDEQ-provided Interim Operational Plan or other LDEQ correspondence or guidance. It is the responsibility of local government to provide the LDEQ plan, correspondence or guidance to any entity that may be charged with operation of the site. All equipment (grinders, chippers, air curtain burners) shall be operated in accordance with manufacturers' instructions and any applicable LDEQ permit.

Chipping and grinding provide material for use in landscape mulch, compost preparation, coastal stabilization/restoration projects, and industrial boiler fuel. These options will be the top priorities for uses of vegetative debris.

In preparing compost and/or mulch piles, care should be taken to reduce the potential for spontaneous combustion. Placing ground organic debris into piles can result in rapid microbial decomposition that generates heat and volatile gases. Temperatures in large piles containing readily degradable debris can rise to greater than 160° F, increasing the chance of spontaneous combustion.

Spontaneous combustion is more likely in large, dense piles of debris under dry, windy conditions. Maintaining windrows with a height of less than 6 feet and base width of less than 10 feet provides greater surface area for dissipation of heat and volatile gases, thereby minimizing the risks of spontaneous combustion.

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Turning piles when temperatures reach 160 degrees can also reduce the potential for spontaneous combustion by allowing accumulated heat and gases to escape. Turning piles when temperatures decline can restore microbial activity and composting temperatures. Optimal moisture should be maintained to reduce combustibility. As a rule, optimal moisture is obtained when squeezing a handful of material yields a drop or two of water. Shredded leafy debris will decompose more rapidly and retain more heat than wood chips. Sufficient wood chips or other bulky materials should be mixed with leafy material to ensure rapid diffusion of heat and gases during the early stages of decomposition.

Large piles or windrows should be located away from wooded areas, power lines and structures. They should be accessible to fire fighting equipment, if a fire were to occur.

Vegetative Debris Burn Sites

Proximity to roads and dwellings is of particular importance in the selection of sites for this activity. LDEQ may approve open burning of vegetative debris on a case-by-case basis. As with all proposed debris management sites, open burning locations must be approved by LDEQ in advance of their use. Even though, burning of vegetative debris is a less desirable option than the reuse of that material in another manner as described above, local governments may utilize open burning during the initial disaster response for specified timeframe (e.g. 2 to 4 weeks) to allow for the reestablishment of critical arteries for transportation, emergency response and governmental operations. In addition where continued burning is necessary, any burning shall utilize equipment to efficiently combust waste and reduce emissions if LDEQ or local governing authority deem the use of equipment necessary to protect public health and the environment. Local, state and federal partners associated with the vegetative debris burning operation will be advised of locations that have been approved for this purpose. All sites must be operated in accordance with the LDEQ-provided Interim Operational Plan or other LDEQ correspondence or guidance.

Air Curtain Pit Burners (Air Curtains or Pit Burners) should be operated in accordance with manufacturers' instructions and with any applicable LDEQ permits or directives.

Ash from Vegetative Debris Burn Sites may be land applied on site or off site. Whenever possible, soil test data and analysis of the ash should be available to determine appropriate application rates. Ash should not be applied during periods of high winds. Ash should not be applied within 25 feet of surface waters or ditches or drains on vegetated sites. These distances should be doubled on sites that are not vegetated, and the ash should be promptly incorporated into the soil. As an alternative to land application, ash from combustion of clean vegetative debris may be utilized as a blending or stabilization component, chemical activator, replacement component in masonry products or a component of pozzolanic concrete. Ash that cannot be land applied or used in an alternative manner shall be disposed at a permitted solid waste landfill.

Assistance in obtaining soil test data and waste analysis of ash should be available through parish offices of the LSU Cooperative Extension Service.

Vegetative Debris Disposal

To the extent possible and practicable, vegetative debris that cannot be beneficially used will be disposed of in permitted landfills. However, due to the devastation caused by a natural disaster, it may be necessary to allow accumulation and disposal of vegetative/woody debris at sites that are deemed appropriate but have not had time to go through the normal permitting process. LDEQ will evaluate requests by local governments and, if it is determined to be warranted for an efficient, expeditious and environmentally safe response, will allow disposal at authorized temporary vegetative/woody debris disposal sites. If approved, operations must comply with the Interim Operational Plan provided by LDEQ.

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Of the total green and woody debris intended for final disposal in a landfill, fifty percent shall be reduced by volume and fifty percent by weight prior to transport to a landfill. This debris may be used in coastal restoration projects, as compost, or as fuel. It may not be disposed of in a landfill as the first option, but may be used as a component of the cover system for a landfill or a means for providing erosion control.

Marsh Debris Management

Retrievable Debris



Retrievable debris items (e.g., vessels, containers, orphan drums, propane tanks, vessels, vegetative/woody matter, white goods, etc.) that are not in a marsh but are located in or near land or a water-body adjacent to a wetland marsh area shall be retrieved for transport to an authorized debris management site. Those items will then be either recycled and/or disposed in accordance with this plan.

accordance with ESF-10 protocol⁴ and transported to an authorized debris management area. Those items will then be either recycled and/or disposed in accordance with this plan.

The debris should, if possible, be retrieved during the initial recovery operation, managed and transported to facilities that are approved for their receipt and management. These debris recovery and removal activities are not expected to result in appreciable habitat disturbance.

Irretrievable Debris

Irretrievable debris items that are located in the marsh, especially sensitive marsh areas, shall be managed in accordance with ESF-10 protocol. These debris management activities are expected to result in appreciable habitat disturbance and therefore, would require an expedited or emergency trustee consultation.

⁴ ESF-10 – Emergency Support Function #10 describes the lead coordination roles, the division and specification of responsibilities among federal agencies, and the national, regional, and onsite response organizations, personnel, and resources that may be used to support response actions. ESF #10 is applicable to all federal departments and agencies with responsibilities and assets to support state, local, and tribal response to actual or potential oil or hazardous materials incidents.

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Marsh Burning

Burning is a practice utilized in marsh areas, especially in areas designated as a refuge. Refuge areas utilize marsh fires on a 2 to 3 year rotational schedule to manage the accumulation of marsh grass and other vegetative/woody debris. The refuges and other entities (i.e. private, parish, state, or federal) owning marsh areas that are non-oil contaminated areas may utilize this method to address the accumulations of marshy grass and debris generated as a result of a natural disaster. The utilization of a marsh fire to address the disaster-generated debris must be communicated to and coordinated with local, state and federal entities (i.e., parish government, property owners, Department of Natural Resources, Department of Wildlife and Fisheries, Department of Environmental Quality, Environmental Protection Agency, United States Coast Guard, United States Army Corps of Engineers, Parish/Local Fire Department) participating in the disaster response and management activities. The plans and procedures pertaining to marsh burning are to be evaluated and authorized by all entities involved in the effort. The plan must take into consideration the potential presence of hazardous, flammable, ignitable or reactive materials that could impact the marsh burning operation.

This is needed so that the proper environmental and personal safety precautions will be set forth in the marsh burning plans and procedures.

Transportation in the Marsh

The specific methods of maneuvering transport vehicles (i.e. marsh buggies, pontoons, etc.) in the various areas of the marsh for the purposes of debris management and retrieval activities will need the concurrence of the Department of Natural Resources (Coastal Management), the Louisiana Department of Wildlife and Fisheries and other pertinent state level agencies. This coordination is also needed to address potential navigation hazards or obstructions posed by the presence of disaster-generated debris in the marsh areas.

Special Debris Management

Munitions and Ordnance

Munitions or ordnance associated with the aftermath of a disaster that remain unexploded either by malfunction, design, or any other cause, shall be handled by an Emergency Response Specialist trained in chemical or conventional munitions or explosives handling, transportation, render-safe procedures, or destruction techniques.

Either the Louisiana State Police or U.S. Environmental Protection Agency's (EPA) regional office staff will be the project manager for disaster-related activities, projects, plans and contracts associated with explosives, munitions, and ordnance. Explosives or munitions emergency response specialists include Department of Defense emergency explosive ordnance disposal, technical escort unit, DOD-certified civilian or contractor personnel, and other federal, state, or local government or civilian personnel similarly trained in explosives or munitions emergency responses.

Munitions and ordnance shall be managed in a manner that shall minimize the potential for detonation or other means of release of hazardous waste, hazardous constituents, hazardous decomposition products, or contaminated runoff to the soil, groundwater, surface water and atmosphere. They shall be stored in accordance with a standard operating procedure specifying procedures to ensure safety, security, and environmental protection; and transported to an LDEQ approved or permitted hazardous waste treatment, storage, or disposal facility.

Household Hazardous Materials

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Local governments should require that contractors demolishing condemned housing units, to the greatest extent practicable, remove and properly handle household hazardous materials such as:



paints and varnishes, solvent, acids, pesticides, cleaning fluids, pool chemicals, used motor oil, propane tanks, mercury thermostats, liquid mercury, mercury containing devices, smoke detectors and refrigerants.

Local governments should request or set up drop off collection sites for citizens. Precautions must be taken at these sites to prevent the release of materials into the environment. Such precautions include providing lined temporary storage areas for accumulation of the material.

Liquefied Petroleum Gas Tanks

Liquefied petroleum gas tanks typically contain propane gas. Propane is a flammable gas that is sometimes generically referred to as LP-Gas, LPG, or Liquefied Petroleum Gas. LPG is typically a propane-butane mixture. Propane might also contain small amounts of other flammable gasses, such as, ethane, ethylene, propylene, isobutane, or butylenes. LPG tanks may be found in a number of urban and rural environments such as motor homes, travel trailers, grills, camp stoves, lanterns, etc. Liquefied petroleum gas is stored under pressure. The gas will leak from any joint or connection which is not sealed properly.

Liquefied petroleum gas is heavier than air and any significant leak will accumulate in any low-lying area such as depressions in the ground, drains or pits. Since LPG is stored in two phases, liquid and gaseous, there is potential for either a liquid leak or a gas leak. If the LPG leak is a gas leak it may not be seen (because LPG is colorless), except where the leak is of sufficient size to be seen shimmering in the air. When a liquid LPG leak occurs, the release will be seen as a patch of ice around the area of the leak, or as a jet of white liquid. This white appearance is due to the cooling effect created by the rapid expansion of the LPG liquid into a gas. The condensing atmospheric moisture makes the leak visible. In concentrated amounts and in uncontrolled conditions, LPG has the potential to create a fire or an explosion.

Debris workers must be observant for LPG tanks. Basically, there are two types of tanks found; they are portable and bulk. Portable, consumer-type tanks can be sized from 4 to 40 pounds, though the most common is the 20 pound tank. Bulk tanks are often 100 to several hundred thousand pounds.

It is vital that LPG tanks be located. Portable tanks can be re-located to a staging area for recertification, refurbishment or dismantling. Bulk tanks should not be moved except by properly train personnel. Tanks measuring 25 gallons and larger should be listed in the LPG Commission database.

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Vehicles and Vessels



Local governments need to propose an aggregation point for the temporary storage of abandoned vessels and vehicles. These sites should be secure, fenced and lighted. LDEQ shall evaluate and, if appropriate, authorize the aggregation site. The Office of State Purchasing will negotiate contracts related to the recovery and recycling of abandoned vehicles. The Louisiana Department of Transportation and Development will be the project manager for the vehicle recovery and recycling project associated with the disaster response.

Vehicles and vessels brought to the storage areas should be inventoried by license plate, make, model, color and vehicle identification

number. They shall be staged and site tagged for easy retrieval. Scrap vehicles should be dismantled and properly recycled. The following materials must be recovered: gasoline and diesel fuel, refrigerants, lubricating oils, mercury ABS switches, mercury convenience switches, lead acid batteries, brake and transmission fluid, antifreeze and tires. Propane tanks and large appliances in recreational vehicles should be removed.

Vessels deemed for scrap should be crushed to reduce volume for easier handling and management, shredded and properly recycled when possible. The following materials must be recovered: gasoline and diesel fuel, refrigerants, lubricating oils, mercury bilge switches, propane tanks, large appliances, lead acid batteries, transmission fluid and electronics such as radar sets, radios, GPS units, and depth finders.

Electronic Goods

In order to contribute to increased recycling and to reduce the volume of waste disposed in landfills, electronic waste (electronic goods or e-goods) should be segregated, to the greatest extent possible, at the curbside. Local governments should set up drop-off collection sites for citizens for electronic goods. Local governments should require contractors demolishing condemned structures, to the greatest extent practicable, to remove and properly handle televisions, computers/computer peripherals, audio/video equipment, VCR's, DVD players, video cameras, telephones, fax and copy machines, cell phones, wireless devices and video game consoles, including those at commercial locations.

If staged at an authorized or permitted solid waste facility prior to scrapping/recycling, electronic goods shall be stored in an area separate from other solid wastes.

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White Goods

Local governments should set up drop-off collection sites for citizens for large appliances (white goods). Local governments should require contractors demolishing condemned structures, to the greatest extent practicable, to remove and properly handle household appliances, televisions and computers, including refrigeration and freezing units at commercial locations.



If staged at an authorized or permitted solid waste facility prior to scrapping/recycling, white goods (i.e. unsalvageable refrigerators, freezers, air conditioners, stoves, range tops, etc) shall be stored in an area separate from other solid wastes and shall be stored in a manner that prevents vector and odor problems and shall be removed from the facility within 90 days. Refrigerant Containing Appliances (RCAs) such as refrigerators, freezers and air conditioning window units shall be handled in a manner, which will prevent a release of refrigerants.

RCAs will be delivered to approved collection sites for refrigerant removal. EPA certified refrigeration technicians will remove

refrigerants and handle in accordance with EPA standards. Refrigerants shall be removed from condemned structures with split system air conditioning units prior to demolition. Only EPA certified refrigeration technicians will remove and handle refrigerants in accordance with EPA standards. Condensing units will then be removed from site and sent to an appropriate collection site. When possible, evaporator and air handling units should be removed and sent to an appropriate collection site.

Asbestos

Licenses Required by the Louisiana State Licensing Board for Contractors (LSLBC):

Contractors performing asbestos abatement must be licensed by the Louisiana State Licensing Board for Contractors. Licensing for asbestos abatement is established under the Commercial license with a specialty in Asbestos. Additional information for licensing can be found at HTU<http://www.lslbc.louisiana.gov/index.asp> or by calling (225) 765-2301.

A licensing requirement is that one Supervisor/Contractor acting as the responsible individual for the company must be accredited with LDEQ. Following approval from the Louisiana State Licensing Board for Contractors, all abatement workers/supervisors performing work in Louisiana are required to be accredited by LDEQ. The LDEQ Asbestos Accreditation Form (AAC-1) can be found at HTU<http://www.deq.louisiana.gov/portal/Portals/0/permits/AsbestosandLead/AAC-1%20Asb%20App%20Form%2020106.doc>UTH. Note that there is a fee for emergency processing (3 days or less).

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Asbestos Accreditations and Notifications Required by LDEQ:

The Louisiana Air Quality regulations, Chapters 27 and 51, Section 5151, contain the requirements for Asbestos Demolition and Renovation abatement activities and accreditation for Workers, Supervisor/Contractors (including air monitoring personnel), Inspectors, Management Planners, and Project Designers. These regulations may be found at [HTUhttp://www.deq.louisiana.gov/portal/Portals/0/planning/regs/title33/33v03.doc](http://www.deq.louisiana.gov/portal/Portals/0/planning/regs/title33/33v03.doc)UTH.

All personnel working as Asbestos Workers, Supervisor/Contractors (including air monitoring personnel), Inspectors, Management Planners, or Project Designers must be accredited by LDEQ. Initial and subsequent Asbestos Hazard Emergency Response Act (AHERA) training by an EPA recognized training provider or a training provider recognized by a state program authorized by EPA is required for accreditation. A picture I.D. card and the appropriate fee(s) are also required. The LDEQ Asbestos Accreditation Application form can be found at [HTUhttp://www.deq.louisiana.gov/portal/Portals/0/permits/AsbestosandLead/AAC-1%20Asb%20App%20Form%2020106.doc](http://www.deq.louisiana.gov/portal/Portals/0/permits/AsbestosandLead/AAC-1%20Asb%20App%20Form%2020106.doc)UTH.

Also, a list of Louisiana recognized training providers can be found at <http://www.deq.louisiana.gov/portal/Portals/0/permits/AsbestosandLead/Current%20Asb%20Course%20Schedule%206706.pdf>.

The LDEQ is capable of expediting the accreditation process for the disaster affected areas, including disaster related abatement, and is able to provide almost immediate accreditation by letter, if necessary. Follow up certificates are then generated as soon as possible for all approved applicants. During the review process, if an applicant does not submit the necessary credentials, additional paperwork will be requested. If the requested paperwork is not submitted, the accreditation for that person will be halted.

The LDEQ Asbestos Notification form for Demolition or Renovation can be found at [HTUhttp://www.deq.louisiana.gov/portal/Portals/0/permits/AsbestosandLead/AAC-2%20Asb%20Not%20Form%20022106.doc](http://www.deq.louisiana.gov/portal/Portals/0/permits/AsbestosandLead/AAC-2%20Asb%20Not%20Form%20022106.doc)UTH

Complying with the LESHAP Asbestos Regulations:

The purpose of this portion of this document is to provide guidance for compliance with the standards for the demolition and renovation activity pursuant to the Louisiana Emission Standard for Hazardous Air Pollutants (LESHAP) for asbestos (LAC 33:III.Chapter 51.Subchapter M). Subchapter M has been deemed to be at least as stringent as the federal regulation and the LDEQ has received delegation of the National Emissions Standard for Hazardous Air Pollutants program from the US EPA. The LDEQ has used EPA guidance to provide similar guidance in the wake of Hurricanes Katrina and Rita in the determination of compliance with Chapter 51 (and through delegation, the NESHAP). In the aftermath of Hurricanes Katrina and Rita, LDEQ also received "No Action Assurance" letters from EPA that provided targeted flexibility regarding compliance with NESHAP regulations. Should the nature or magnitude of the disaster warrant, LDEQ will initiate contact with EPA for similar regulatory flexibility.

General Guidelines for Demolition and Related Activities:

Best Management Practices – Conduct all asbestos demolition, LDEQ approved grinding of non-regulated asbestos containing material, transportation, and disposal activities using best management practices and engineering controls to control emissions. These include, but are not limited to, wetting structures/materials before, during and after demolition or grinding, controlled collapse of walls, and taking all reasonable steps to avoid running over asbestos containing material with heavy equipment.

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Site Security – For all demolition, grinding and disposal sites handling asbestos containing material, establish and implement procedures to restrict public access.

Air Monitoring – Conduct air monitoring for the presence of asbestos fibers at enhanced construction and demolition debris landfills and LDEQ approved grinding facilities.

Structures Demolished by the Disasters and Debris on the Ground:

If a house or structure has been effectively demolished by the disaster, collection, treatment and disposal of the debris is not covered by LAC 33:III.5151.F. Additionally, this debris is not subject to the asbestos LESHAP, in accordance with EPA guidance.⁵P

Structures That Remain Standing After the Disasters:

1. Demolition or renovation of any facility, as defined in LAC 33:III.5151, is required to comply with LESHAP regulations.
2. Demolition/renovation conducted by homeowner or homeowner's contractor. Renovation or demolition by the individual homeowner of residential buildings with four or fewer dwelling units is not covered by the asbestos LESHAPP⁶ Additionally, the resultant debris is not subject to the asbestos LESHAP.
3. Demolition of residential structures conducted as a result of a government order.

The EPA has indicated that multiple residential buildings of four units or less, being demolished as a result of the disaster in accordance with a government order, are considered an "installation" as defined in the asbestos LESHAPP^{7, 8, 9}P. Assuming the demolition of multiple residential buildings with four dwelling units or less by a single entity are covered by the asbestos LESHAP, the department will consider compliance with this guidance as compliance with the asbestos LESHAP. It will be the responsibility of the local government or its contractors to determine the boundaries of the installation site. EPA's guidance with respect to "site" states that the site should be a "relatively compact area", but "the local government should use common sense when applying this guide."¹⁰ P EPA also states that "EPA believes that if a demolition project involves the demolition of several contiguous city blocks, the entire area could be considered a site."¹¹P

⁵ Letter dated November 9, 2005, EPA (Coleman) to US Army Corps of Engineers (Smithers), which states: "If a building or other structure was totally destroyed by a hurricane, then the National Emission Standard for Asbestos, 40 C.F.R. Part 61, Subpart M (Asbestos NESHAP) does not apply to any subsequent activities. For such destroyed structures, you may immediately begin removal and proper disposal of the resulting debris."

⁶ NESHAP Clarification of Intent, Federal Register, July 28, 1995, Volume 60, Number 145, pages 38725-38726 which states: "EPA believes that individual small residential buildings that are demolished or renovated are not covered by the asbestos NESHAP. This is true whether the demolition or renovation is performed by agents of the owner of the property or whether the demolition or renovation is performed by agents of the municipality. EPA believes that the residential building exemption applies equally to an individual small residential building regardless of whether municipality is the "owner or operator" for the purposes of demolition or renovation."

⁷ NESHAP Clarification of Intent, Federal Register, July 28, 1995, Volume 60, Number 145, pages 38725-38726 which states: "However, EPA believes that the residential building exemption does not apply where multiple (more than one) small residential buildings on the same site are demolished or renovated by the same owner or operator as part of the same project or where a single residential building is demolished or renovated as part of a larger project that includes demolition or renovation of non-residential buildings." The notice further states: "EPA does not believe the residential building exemption was designed to exempt larger demolitions or renovations on a particular site, even where smaller residential buildings are involved."

⁸ EPA has also issued subsequent Applicability Determinations which support this position. See Determination Detail, Control #A960033, dated 11/01/1995 and Control #A970008, dated 09/04/1997.

⁹ Letter dated November 9, 2005, EPA (Coleman) to US Army Corps of Engineers (Smithers), which states: "Please note that demolition and disposal of "partially-damaged" or "standing-but-unsafe-to enter" structures are subject to Asbestos NESHAP requirements."

¹⁰ NESHAP Clarification of Intent, Federal Register, July 28, 1995, Volume 60, Number 145, pages 38725-38726.

¹¹ Ibid.

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Notification of demolition and wetting requirements apply in all instances of demolition using the AAC-2 form. The AAC-2 form may be located on the LDEQ's Asbestos and Lead web page at [HTUhttp://www.deq.louisiana.gov/portal/Default.aspx?tabid=2251](http://www.deq.louisiana.gov/portal/Default.aspx?tabid=2251)UTH.

A. Facilities that are structurally unsound or uninhabitable

It is the responsibility of local governments and their contractors to determine which houses should be demolished because they are unsound or otherwise uninhabitable, and to prepare a list of the houses to be demolished. These residences may be demolished in accordance with more streamlined demolition requirements provided by EPA.

Since no inspections are performed, the entire waste stream must be disposed of in a permitted Type I or II landfill or other LDEQ approved landfill that meets federal NESHAP disposal standards (such as an enhanced C & D landfill which are required to have additional controls to meet or exceed the federal standards under NESHAP (see 40 CFR § 61.154)).

B. Structurally Sound Homes

For the installations consisting of sound residential structures, the LESHAP/NESHAP requires a thorough inspection of such residential structures by an asbestos inspector accredited by the LDEQ. The "LDEQ Inspection Protocol for "thorough inspections," is considered compliant with LESHAP, and can be found at <http://www.deq.louisiana.gov/portal/Default.aspx?tabid=2251>.

C. Thorough Asbestos Inspections

Thorough asbestos inspections must be conducted by asbestos inspectors accredited by LDEQ. The LDEQ Inspection Protocol for "thorough inspections", which is considered compliant with LESHAP, must be followed when conducting a "thorough inspection" for the purposes of compliance with LESHAP.

Disposal of Waste Streams Resulting From Inspections and Demolition Activities



In order to address debris disposal needs as a result of recovery efforts after Hurricanes Katrina and Rita, LDEQ established criteria for Enhanced C& D Landfills. These enhanced landfills meet federal NESHAP disposal standards. Facilities meeting these requirements and approved by the LDEQ were utilized to effectively dispose of storm related debris. Should the nature or magnitude of the disaster warrant, LDEQ will reactivate the Enhanced C&D Landfill procedures to maximize debris disposal options.

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- Debris from residences that are being treated as structurally unsound and in danger of imminent collapse must be disposed of in LDEQ permitted Type I or II landfills authorized to accept asbestos or other LDEQ approved landfills that meet federal NESHAP disposal standards (such as an enhanced C & D landfill).
- Non-regulated Category I and II ACM (Non-RACM) may be disposed of at designated areas within permitted Type III landfills that are LDEQ approved for Non-regulated Category I and II disposition.
- RACM that has been removed from residences for which a thorough inspection has been conducted must be disposed of in permitted Type I or II landfills authorized to accept asbestos.
- C&D debris waste may be disposed of at LDEQ approved construction and demolition debris waste sites.

Handling of Debris and Waste Materials from Demolition Activity

The following applies to demolition activities conducted on residential structures that are considered part of an installation:

1. For installations where residences are being thoroughly inspected prior to demolition and RACM is identified, or where residences are being treated as structurally unsound and in danger of imminent collapse, appropriate procedures for asbestos emission control provided by LAC 33:III.5151.F.3 shall be employed. The wet method (fogging/misting) should be used prior to demolition, during demolition and during loading of the material. Mist the houses, including asbestos-containing roofing shingles and siding, remove, segregate and transport in an appropriate manner to a permitted asbestos Type I or II landfill, enhanced C&D debris landfill or regular C&D debris landfill as appropriate. The removal and segregation of material suspected to contain asbestos, including asbestos containing roofing and siding, is recommended.
2. Each structure should be knocked down in a controlled manner to minimize excess breakage of asbestos containing material. Debris should be wetted during demolition, interim staging, and loading activities.
3. It may not be necessary that Category I asbestos containing material (vinyl tile, mastic, etc.) be removed and segregated from the construction and debris waste if it does not have a high probability of becoming friable. If this material does not become friable by the forces expected to act on the material in the course of demolition, it may be disposed at a designated area in an approved C&D disposal site. Regarding Category I asbestos containing material, follow the LDEQ Inspection Protocol for "thorough inspections."

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4. Removal of RACM from Inside Sound Structures. For structurally sound structures, shut windows and doors. If they cannot be shut, install critical barriers (e.g. polyethylene sheeting). However, sufficient wetting is required to manage emissions during removal.
 - a. Negative air is not required;
 - b. The wet method must be employed to remove the regulated ACM;
 - c. Regulated ACM waste must be bagged and labeled;
 - d. Bulk material left behind must be visually inspected and cleaned appropriately;
 - e. No air monitoring clearance is necessary;
 - f. Walls, ceilings, floors, etc. must be encapsulated to ensure ACM fibers are not being released during demolition and loading;
 - g. Follow demolition procedures as noted in this plan, and use OSHA worker protection guidelines.

Tires

Because the occurrence of a disaster has the potential to generate a staggering number of waste tires removed from flooded or inoperable vehicles and may potentially cause an enormous drain on the Waste Tire Management Fund (WTMF), the decision on whether or not the tires will be eligible for payment through the WTMF will be made at the time of the issuance of an Emergency Declaration and Administrative Order by the Secretary of LDEQ. Regardless of payment or nonpayment from the fund, if tires cannot be resold or recycled through existing programs or processes, they will be managed as disaster-generated debris in accordance with LDEQ regulations or provisions of the Emergency Declaration and Administrative Order.

Final Disposal Options

This plan is designed to ensure that disaster-generated debris that requires disposal is managed and disposed in a manner that is protective of public health and the environment. Disaster-generated debris requiring disposal shall be managed and disposed at sites that have either been permitted or authorized by the LDEQ.

Uncontaminated disaster-generated trees, leaves, vines, twigs, branches, grass, and other vegetative debris may be disposed of in permitted Type II or Type III landfills. Uncontaminated wood debris generated from construction intended for final disposal must be segregated and reduced in volume and weight prior to transport to a landfill.

Disaster-generated debris contaminated with oil (i.e. crude oil, petroleum refined product) shall be disposed in a Type I Solid Waste Landfill, except that oil contaminated marsh grass may be approved for burning on a case by case basis. Disaster-generated debris that is visibly covered with oil is considered to be oil contaminated debris.

The burning of disaster-generated debris contaminated with or containing hazardous waste is prohibited.

Creosote treated telephone poles, railroad crossties or treated wood chips must be disposed in a Type I Solid Waste Facility.

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Construction and demolition debris that is mixed with other disaster-generated debris need not be segregated from other solid waste prior to disposal in a permitted solid waste landfill. Non-recyclables and residuals generated from segregation of disaster-generated debris shall also be disposed of in a Type II or III landfill.

Putrescible waste (e.g. rotting food that has been removed unsalvageable refrigerators and freezers) shall be disposed of in a Type II landfill.

The disposal of excessive accumulations of small animal carcasses shall be in accordance with the Louisiana Department of Health and Hospitals sanitary code. The disposal of large animal carcasses (e.g. horses, cows) shall be in accordance with the instructions from the Louisiana Department of Agriculture.

Hazardous waste generated as a result of the disaster event must be separated from other disaster-generated waste and disposed of at a permitted commercial hazardous waste disposal facility. Recyclables and hazardous waste must be segregated for beneficial environmental use prior to transport to a landfill. While household wastes are classified as solid wastes that are not hazardous wastes, it is imperative that the household waste collected during this event be managed not only in an environmentally sound manner but also in accordance with the appropriate LDEQ rules and regulations governing the storage and processing of this type of waste.

Formosan Termite Control

Landfills are an ideal environment for these subterranean termites, especially in humid Louisiana. For this reason, restrictions are in place from the Louisiana Department of Agriculture and Forestry designating where in Louisiana potential Formosan termite contaminated debris might be disposed. Landfill operators, contractors and waste generators should consult with the Department of Agriculture and Forestry regarding proper disposal of Formosan termite debris. Contact Mr. Bobby Simoneaux at (225) 925-3763 or [HTU**bobby_s**@**ldaf.state.la.us**UT](mailto:HTUbobby_s@ldaf.state.la.usUT)

APPENDIX E

LDEQ Inspection Protocol to comply with the term “thorough inspection”

An LDEQ accredited asbestos inspector performs an inspection whereby all suspect Asbestos Containing Material (ACM) is sampled and samples are analyzed by an LDEQ accredited laboratory, utilizing Polarized Light Microscopy (PLM). This includes but is not limited to:

1. Friable material such as walls, ceilings, insulating materials, floor coverings, fire proofing, window caulking, etc;
2. Category I nonfriable ACM that has become friable;
3. Category I nonfriable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading, in accordance with 40 CFR Subpart M-National Emission Standard for Asbestos, 61.141. Definitions; and
4. Category II nonfriable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by the forces expected to act on the material in the course of demolition or renovation operations.

Category II material such as cement asbestos containing roofing shingles and siding are to be assumed ACM.

The number of samples taken shall be in accordance with the Asbestos Hazard Emergency Response Act (AHERA). Where feasible, AHERA should be employed with the exception of a partial inspection.

An inspector may make a determination that Category I material such as resilient floor covering, caulking, etc. is in good condition by administering hand pressure. If the material is not friable and in good condition, it is not necessary to sample the material because it is Category 1 in good condition that does not have a high probability of becoming regulated ACM, and is therefore considered to be non regulated.

Partial Inspection

Where a “thorough inspection” can be conducted on the majority of the structure, including sampling of suspect ACM if any is present, that procedure will be completed to the extent possible. If suspect RACM is present and verified by sampling to be RACM, the structure will be demolished and disposed as RACM. In the case where the partial inspection reveals either no suspect RACM or sampling demonstrates that no RACM is present, that part of the structure will be demolished as C&D debris.

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After the unstable/inaccessible portions of the structure are made safe and accessible, the accredited asbestos inspector will verify that the materials in that part of the structure are homogeneous with the materials that were inspected during the partial inspection. If determined to be homogeneous and no other RACM is identified, the remainder of the structure will be determined to be C&D debris. However, if the inspector determines that the materials in the unstable/inaccessible portion of the structure are not homogeneous or that RACM is present, the unstable/inaccessible portion of the structure will be demolished and disposed as RACM.

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APPENDIX F

PLAN FOR EVALUATING UNDERGROUND STORAGE TANK SITES IMPACTED BY HURRICANE GUSTAV

PROBLEM DEFINITION

On September 1, 2008, Hurricane Gustav struck Louisiana causing widespread damage. The specific effects of the Hurricane were unforeseen and uncontrollable; and emergency conditions (threats to human health and the environment) persist. Underground Storage Tank (UST) sites have been impacted by flood waters which will require actions be taken to place these sites back into operation. Steps necessary to place the site into operation are being outlined to ensure that new releases do not occur and if releases are identified in this process that they are properly addressed. The focus of this effort will be to place these sites into operation while ensuring protection of human health and the environment.

BACKGROUND

Flooding and damage related to the Hurricane has raised many issues regarding Underground Storage Tank site status. Damage to UST systems as well as remediation systems is expected. The impact of this damage must be evaluated to determine what steps are necessary to place these sites back into service.

Damage that occurs to UST systems generally results from: the buoying up of tanks which are partially full or empty, water entering the tanks and displacing product, failure of underground piping as a result of stresses induced by groundwater pressures or debris, and damage to electrical systems from extended contact with water. Additionally, another route of infiltration exists if the level of floodwaters exceeds the top of the vent lines. Regulated UST's which are weighted down with fuel or anchored by other means (deadmen or attached to an underlying pad) and have properly installed and tightened filler caps and vapor recovery port caps should sustain little impact, even after being submerged for days.

Tanks in which fill caps are not tightened will fill with water and then spill product, some of which may percolate into shallow soil. Empty or near-empty tanks will float up, destroying overlying concrete/asphalt and distribution lines, also spilling product. In these situations, it is expected that the entire UST system would require replacement. Presently, the extent and magnitude of damage to UST systems themselves and to the shallow subsurface environment as a result of the Hurricane is unknown. At this time the primary objective is to put these systems back into proper service to meet the fuel

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supply need of initial and subsequent response efforts. Later, as time and resources permit, assessment and remediation of any environmental impacts will take place.

UNDERGROUND STORAGE TANK EVALUATION

Underground Storage Tank sites flooded by the Hurricane must be evaluated to determine response actions necessary to place these UST facilities back into service and protect human health and the environment. New product should not be placed in the tanks if there are indications that the integrity of the tank has been comprised when performing the activities outlined below.

General Information:

UST Owners/Operators will be responsible for evaluating underground storage tank systems to determine if they are suitable for receiving product. Flooded systems that are **determined to be suitable for receiving product** may be put back into service and should have an integrity test performed as soon as contractors and services become available to perform the testing and no later than six (6) months after product was first placed into the tank after flooding. If the tank inspection outlined below (or subsequent monitoring of the tank), indicates that the system has been comprised; **the system should be taken out of service** and repaired or replaced as necessary and an integrity test performed prior to again putting the system into operation.

The Department has established contact telephone numbers to be used by contractors and citizens for reporting exigent conditions and for questions concerning problems with UST systems. These numbers are (225) 219-3236 and (337) 849-7160. (Department's 3rd floor receptionist). These procedures for contractors are being provided to tank owners, tank removal and installation contractors, response action contractors and trade groups that represent the industry such as Louisiana Oil Marketers Association and Louisiana Mid-Continent Oil and Gas Association. This information will also be posted on the Department's Web Site.

General Evaluation Protocol for Contractors:

No equipment should be turned on prior to examination. Check all electrical panels and make sure they are clean and dry. All equipment related to electric power service should be inspected and any necessary repairs should be made prior to power restoration. This includes all fueling systems, leak-detection devices and corrosion prevention (impressed current) equipment. The electrical system should be checked for continuity and shorts (pumps, turbines, dispensers, ATG consoles, emergency shutoff, panel box, etc.)

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Specifically, all electrical junction boxes and dispenser heads should be opened, inspected and dried if necessary. Conduits should be inspected for the presence of water, insulation damage, shorts or opens. Conduits exhibiting water should be dried or vacuumed as appropriate and all defective wiring should be replaced. To apply electrical power to a UST system before conducting basic examination could be extremely dangerous.

Submerged pumps and dispensers should not be operated if there is the possibility of water entering into the system as pumping water may damage hydraulic components.

Technical Protocol for Contractors:

These protocols should be followed to place tanks back into service:

1. Stick tanks using water finding paste or read automatic tank gauge system, if operable, to determine whether water has entered the UST.
2. Flooded or water impacted tanks and all lines may need to be drained of water and dirt/mud or perhaps pumped dry and cleaned as conditions warrant. Liquids removed must be properly handled and disposed.
3. Interstitial spaces of tanks and lines of double walled systems, if flood-impacted, will need to be drained and flushed where possible. Blockage of interstitial spaces will render leak detection useless. Depending on the level of residual contamination at the facility, certain leak detection methods may no longer be viable. Tanks with brine or vacuum interstitial sensors may be returned to service if brine or vacuum levels are normal. Be prepared to update damaged leak detection equipment after emergency conditions are abated.
4. All facility sumps, pans, and spill buckets need to be pumped dry and cleaned. Replace sump lid gaskets if applicable. If sump lids are missing, replace with new water tight lids. Replace sumps and spill buckets that fail to prevent water intrusion after initial cleaning and drying.
5. Check tank bottoms for water and debris. Remove and dispose as appropriate (see item #2 above).
6. Check deflection of fiberglass tanks. If deflection is greater than manufacturer's specification (general guideline is 2%) call the manufacturer for instruction.
7. If tanks shifted and problems are found, **repair or replace them** according to manufacturer's instructions and appropriate industry standards and

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regulations. Obviously, these **systems should be shut down and not receive fuel** until they are deemed safe for reuse (tightness tested).

8. Check vents for movement, cracking, blockage and proper operation.
9. Check dispenser filters and submersible check-valve screens for plugging with dirt or mud.
10. Flush dispensers and UST system if necessary. Collect fluids for proper disposal.
11. Check critical safety devices (e.g., emergency power off controls, line leak detectors, air compressor pressure limiters, shear valves, stop switches, isolation relays on dispensers, etc.). Shear valves may be salvaged if they can be cleaned and lubricated with corrosion preventative. Some will still have to be replaced.
12. Sump sensors may need to be replaced after emergency conditions cease.
13. In-tank pumps, Automatic Tank Gauge (ATG) probes, overfill devices, automatic line leak detectors, fill and vapor dust caps, etc. should be assessed. Assess their condition after cleaning and replace as necessary.
14. ATG consoles and any associated electronics that are not submerged, should have a programming and operability check performed by a certified technician after emergency conditions cease.
15. After emergency conditions are abated, submerged Corrosion Protection (CP) rectifiers and associated aboveground equipment protecting tanks and/or lines may have to be replaced. If not submersed have a National Association of Corrosion Engineers (NACE) certified professional perform an operability check of the equipment. Inspect CP lines in saw cuts for damage and replace as necessary. If CP systems are out of service for an extended period of time perform integrity assessment of affected component before placing CP system back into service. A NACE certified professional will be helpful assessing the CP system.
16. Check accessible fittings, valves and miscellaneous piping for damage and corrosion. Clean and replace as necessary.

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17. Document all inspection, assessment and repair activities at each UST system site. Provide this information to the Department in stand-alone report format within ninety (90) days of initiation of operations of that UST facility.
18. Submerged dispensers will have to be replaced or repaired as necessary. This includes the hanging hardware. Any suction system dispensers will probably have flood impacted motors and pumps and may need complete replacement.

General Protocol Upon Resumption of Service:

Depending on the level of residual contamination at the facility, certain leak detection methods may no longer be viable. Daily inventory control (with strict record keeping) may be the short-term leak detection method by necessity. Daily checks for water with water-finding paste should be done for several days until it has been determined that the system is tight. If these daily water checks indicate excessive water or the daily inventory control shows loss of product, **the tanks should be emptied of product and use of the tanks should cease**. Notification of these conditions should be made to the Department's UST hotline ((225) 219-3406) as soon as practical.

Post Start-Up Protocol for Contractors:

This protocol should be followed once flood-impacted tanks have been placed back into service and emergency response and restoration have been completed or as otherwise directed by the Department:

Precision tightness test tanks, lines and interstitial spaces (after emergency conditions abate). Assess interstitial spaces for blockages, especially if used for leak detection. Decisions regarding replacement of tanks and lines should be made based on outcome of these tests. Department field staff should be consulted on these decisions whenever possible. Cathodic protection systems should be checked to make sure they are connected and operational.

These actions are being delayed in an effort to expedite fuel delivery capabilities and due to unavailability of sufficient contractors to perform the otherwise required work in a timely manner. All leak detection equipment must be put back into operation as soon as practically possible or as directed by the Department after the emergency has abated.

Other General Provisions for Owner/Operators and Contractors:

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At flood-impacted sites, facilities will be allowed to salvage useable fuel in USTs by checking fuel for water and allow salvage of useable fuel. If flood water covered vent lines, displacement of fuel would have occurred and large volumes of water may exist in the affected USTs and require proper storage/disposal. This water should not be discharged to areas such as streets, storm drains, sumps and ditches that are not permitted to receive these liquids.

Requirements for remediation of contaminated groundwater via approved corrective action plans in place prior to the Hurricane are suspended at UST sites in the parishes of the emergency areas unless otherwise directed by the Department. However, the Department may require systems remediating free phased product to continue pumping operations.

Sites which have not experienced impacts from the Hurricane shall continue with routine remedial efforts and reporting (Unless RAC/consulting firm handling the remediation has been affected and displaced by the storm).

All facilities in which remedial efforts are temporarily suspended or delayed must provide notice to the Department by calling (225) 219-3236 and provide written documentation as directed.

EVALUATION SCHEDULE

The evaluation of UST status should be initiated as soon as conditions allow flood area re-entry. Further testing will be performed once emergency conditions and major restoration efforts are complete and when sufficient contractors are available to perform the work. This further testing should be performed no later than six (6) months after product was first placed into the tank after flooding.

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APPENDIX G

GUIDANCE FOR SPECIAL WASTE HANDLING, REUSE AND RECYCLING

The following information is intended to assist operators of solid waste facilities, recycling centers, scrap metal dealer, local governments, and contractors in handling debris from the Emergency Areas. The Debris Management Plan (Appendix D) should be consulted for greater detail.

1. Intent

Every effort should be made to minimize debris disposed in landfills. Diversion, composting and recycling debris are priorities. Debris handlers should make every effort to properly handle and recover debris materials that have reuse value, are recyclable or the release of which into the environment would be detrimental or is prohibited, e.g. used motor oil.

2. Scope

Sources of debris requiring special handling include: households, businesses, schools, public buildings, automobiles and boats.

3. Types of materials by source

The types of debris to which this guidance is directed and the sources from which the subject debris emanates are as follows:

- a. From automobiles: gasoline and diesel fuel, refrigerants, lubricating oils, mercury ABS switches, mercury convenience switches, lead acid batteries, brake and transmission fluid, antifreeze and tires. Propane tanks and large appliances in recreational vehicles should be removed.
- b. From boats: gasoline and diesel fuel, refrigerants, lubricating oils, mercury bilge switches, propane tanks, large appliances, lead acid batteries, transmission fluid and electronics, such as, radar sets, radios, GPS units, and depth finders.
- c. From households and businesses: paints and varnishes, solvents, acids, pesticides, cleaning fluids, pool chemicals, used motor oil, propane tanks, mercury thermostats, liquid mercury, mercury-containing devices, and refrigerants. Large appliances also known as "white goods" may not be landfilled. Refrigerants must be removed. Food should not be left in appliances. Every reasonable effort should be made to recover large electronic devices, such as, television sets, computers and computer monitors.
- d. From schools and public buildings: paints and varnishes, solvents, acids, pesticides, cleaning fluids, pool chemicals, used motor oil, propane tanks,

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mercury thermostats, liquid mercury, mercury-containing devices, and refrigerants. Large appliances also known as "white goods" may not be landfilled. Refrigerants must be removed. Food should not be left in appliances. Every reasonable effort should be made to recover large electronic devices, such as, television sets, computers and computer monitors. Special attention should be given to school chemistry laboratories.

3. Monitoring

Demolition teams, debris collectors, local governments and landfill operators should be vigilant for proper handling the above listed items.

4. Recordkeeping

Processors should keep a record of the amount of materials recovered and transported for recycling. Some products already require recordkeeping, e.g. used oil, and duplicate recordkeeping is not required.

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APPENDIX H

PUBLIC NOTICE AND PUBLIC PARTICIPATION PROCEDURES REGARDING PROPOSED PERMIT ACTIONS IN HURRICANE IMPACTED AREAS

The dislocation of residents and the damage to infrastructure in the Emergency Areas has affected the ability of the Department of Environmental Quality to solicit and receive comments on proposed permit actions. The following procedures are intended to address these issues in a manner that offers the opportunity for meaningful public participation and that meets the requirements and intent of the state and federal permitting statutes and regulations.

Public notice and comment procedures will vary according to the categorization of the parish in which the facility at issue is located. The Department will categorize parishes after evaluating all relevant factors, including but not limited to:

1. newspaper circulation rates (both paid subscriptions and free distribution), comparing pre-hurricane with current rates;
2. basic services - power, potable water, and sewage treatment;
3. local government approval for residents to return for long-term habitation;
4. number of schools that are open;
5. availability of locations to serve as document repositories and in which to conduct public hearings should they be requested;
6. condition of roads.

Category 1 parishes are those with newspaper circulation rates of at least 90% pre-hurricane levels. Basic services are restored to at least 90% pre-hurricane levels. The parish is open for long-term habitation and public schools have resumed operation.

In Category 1 parishes, the Department will continue to implement the public notice procedures in place before the Hurricane. This includes publication in the required newspapers, sending notice to individuals on the Department's permits mailing list, placing notice on the Department's web page, and sending electronic notice to individuals who have registered with the Department to receive notices in this manner. The DEQ Public Participation Group (PPG) will use its knowledge of newspaper distribution rates and patterns to determine if the notice should be placed in more than one local newspaper. Some permit procedures require notice to also be placed in the official state journal, *The Advocate*.

Category 2 parishes are those with newspaper circulation rates of at least 50% pre-hurricane levels, and basic services restored to at least 50% of the parish. The parish is open for long-term habitation and public schools have resumed operation.

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In Category 2 parishes, the Department will follow the same procedures provided herein for Category 1, with the addition of the following: Notices will be placed in *The Advocate* to identify the permits placed on public notice for the previous week, sorted by parish. These notices will clearly identify the electronic web link to view the public notices and will give the phone number to call to request additional information or to find out where documents may be reviewed locally.

Category 3 parishes are the most severely affected parishes. Any parish not meeting all of the criteria for Category 2 are considered Category 3.

In Category 3 parishes, the Department will follow the same procedures provided herein for Category 2, with the addition of the following:

1. Comment periods will be extended a total of fifteen (15) extra days.
2. Notices will be published twice in the selected newspaper(s).
3. An additional newspaper will be selected in which to publish the notices. This will be the newspaper with the largest circulation in a parish that physically adjoins the parish in which the facility is located.
4. If not already required to do so, the Department will publish notices in *The Advocate*, the official state journal.

When arranging public hearings to solicit comments regarding permitting activities, the Department will work with stakeholders to find suitable hearing site locations.

Index of Variances/Waivers ~ Hurricane Gustav

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
Marathon Petroleum Company LLC - LA Refining Division - Garyville Refinery	Variance to store sulfur on a concrete pad until it becomes safe to resume transportation after the hurricane. The temporary sulfur storage will only be implemented after MPC had exhausted all other means for getting molten sulfur trucked out of the refinery and only if, due to hurricane, disruption of trucking operation occurs. The variance will also address shutdown of the refinery in the event Hurricane Gustav creates unsafe operating conditions. Any shutdown should occur no earlier than August 31 and last approximately 2 to 3 days.	8/26/2008	Approved under LAC 33:III.917 subject to the following conditions: 1) This variance expires September 10, 2008. 2) The temporary sulfur storage shall only be implemented after MPC had exhausted all other means for getting molten sulfur trucked out of the refinery and only if, due to hurricane, disruption of trucking operation occurs. A variance does not authorize the maintenance of a nuisance or a danger to public health and safety.	8/29/2008
Union Carbide Corp - St. Charles Operations	Requesting to run the Energy Systems Cogen turbines at a minimal load, for a period of seven days or 168 hours.	8/28/2008	Approved under LAC 33:III.917, subject to following condition: This variance expires November 30, 2008. A variance does not authorize the maintenance of a nuisance or a danger to public health and safety. This variance applies only to the state regulation(s) specified, which may include the adoption by reference of certain federal regulations. Upon adoption by reference, federal regulations also become state regulations and are enforceable by the state. The state has received delegation of the federal program(s) identified in this variance. Adoption of federal regulations by the state in no way voids or diminishes federal enforcement authority with respect to the federal regulations. EPA retains oversight of the federal program and may institute enforcement action independent from the state.	8/29/2008

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
ExxonMobil Chemical Company - Baton Rouge Chemical Plant	Requested a variance on the fuel gases that may be burned in combustion sources at the Baton Rouge Chemical Plant (BRCP) and the Baton Rouge Refinery (BRRF) due to the impending effects of Hurricane Gustav.	8/28/2008	<p>Approved under LAC 33:III.917, subject to the following conditions: ExxonMobil shall notify the Single Point of Contact (SPOC) of LDEQ at (225) 219-3640 prior to utilizing alternative fuel gas options and record the total alternative fuel usage and the total SO₂ emissions resulting from this usage. Records shall be submitted to LDEQ within 30 days after alternative fuel usage has been discontinued.</p> <p>This variance expires September 15, 2008, or upon return of availability of natural gas.</p> <p>A variance does not authorize the maintenance of a nuisance or a danger to public health and safety.</p>	8/29/2008

<p>Louisiana Pigment Company, LP Titanium Dioxide Plant</p>	<p>Requesting to temporarily operate several diesel fired generators and compressors from the time of any order to evacuate until normal power can be restored. Requesting that the Desulfurization Unit and the Off-Gas control devices and associated CEMS be allowed to be bypassed from the time of any order to evacuate until the facility has time to recover from the effects of the hurricane.</p>	<p>8/29/2008</p>	<p>Approved Under LAC 33:III.917, subject to following condition: 1) variance expires October 1, 2008, or whenever the facility equipment, including control and associated monitoring and recordkeeping equipment is repaired and operating properly, whichever comes first. 2) facility shall work diligently to bring the Desulfurization Unit and the Off-Gas Incinerators back into proper operation as quickly as feasible. 3) facility shall work diligently to bring the Off-Gas Incinerators CEMs back into proper operation as quickly as feasible, PSD - LA - 553 (M-6) requirement. 4) Upon reasonable indications that an order to evacuate will occur, the facility is allowed to prepare for and operate the Chlorinators in air idle mode for an average of twelve hours per day during this variance period, after an initial operating period of 24 hours upon evacuation. 5) facility shall keep a record of all efforts to bring the facility into compliance with the issued permit. Records shall clearly identify those actions that were taken in accordance with 40 CFR 70.6(g) Emergency Provisions, and those actions taken with respect to this permit variance. 6) facility shall perform a final process engineering calculation at the end of the variance period to estimate the emissions from the chlorinator based upon actual operations without the control devices and CEMs operational. All records for this variance shall be maintained on site and made available to EPA or LDEQ personnel upon request for a period of 2 years. 7) variance applies only to the state regulation(s) specified, which may include the adoption by reference of certain federal regulations. Upon adoption by reference, federal regulations also become state regulations and are enforceable by the state. The state has received delegation of the federal program(s) identified in this variance. 8) Any rented Diesel Generators which are "affected facilities" under 40 CFR 60 Subpart IIII shall comply with all applicable requirements of that subpart. In accordance with 40 CFR 63.6590(c), (Subpart ZZZZ) compliance with 40 CFR 60 Subpart IIII for compression ignition engines is compliance with Subpart ZZZZ for area sources. Adoption of federal regulations by the state in no way voids or diminishes federal enforcement authority with respect to the federal regulations. EPA retains oversight of the federal program & may institute enforcement action independent from the state. Variance does not authorize the maintenance of a nuisance or a danger to public health and safety.</p>	<p>8/30/2008</p>
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Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
Valero	Request for enforcement discretion	8/31/2008	Facility needs to submit additional information, including a request for <i>force majeure</i> for consent decree issues per the provisions of the consent decree.	9/6/2008
ExxonMobil Refinery	Requesting enforcement discretion and endorsement of intent to increase firing rates on CO Furnaces with Catalytic Cracking Operations to maintain steam demand to keep refinery operations on-line. The increased firing will result in exceedances of CO emission limits for both Title V Operating Permit and the New Source Review Consent Decree. The Baton Rouge Refinery is one of the last refineries still up and operating in the area. It is critical to maintain steam supply within the facility to keep operations going.	9/1/2008	Enforcement discretion granted. Facility asked to provide update as soon as able.	9/1/2008
Motiva Norco Refinery	Variance from requirement to repair fugitive emission components that have been placed on "Delay of Repair."	9/2/2008	Approved	9/2/2008
ExxonMobil Refinery	Requesting variance to restart the Sour Water Stripper which removes sulfur compounds from the process use waters prior to treatment in the wastewater treatment units. Tower vent stream is to go to the flare system directly. This stream is the ammonia acid gas vent stream covered in the NSR CD requirements. Whenever there is a bypass event of this vent stream the facility is required to report and do root cause investigation. This scenario is somewhat different in that the facility will directly bypass the sulfur plant and go directly to the flare, but the facility believes it still falls under upset conditions (<i>Force Majeure</i>) due to the hurricane. Facility will exceed RQ's for H2S and SO2. The stripper will vent to flare until unit operations allow the sulfur plant back on line.	9/2/2008	Enforcement discretion granted. Facility is to send an update when complete. <u>The request was amended</u> - they incorrectly stated that the Refinery Gas Compressors collect the vent stream. The pressure drop from the unit to the flare system is sufficient to move the vent stream without additional motive force.	9/2/2008

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
Entergy	Entergy is going into the coastal areas to do repairs on infrastructure and inquired about the storm water permit rules for these sites since they will not have time to do NOI's and effect quick repairs.	9/2/2008	Entergy advised to do what needs to be done to get power restored. Entergy can do a notification through SPOC that they have begun. Advised to follow as much of the permit requirements as practical; complete paperwork as soon as possible. Enforcement discretion can be employed as necessary.	9/2/2008
Entergy Gulf States Louisiana, L.L.C. Louisiana Station #1	Requested temporary variance to start-up and operate Turbine 5A at low load 16MW, which yields NOx maximum hourly emissions greater than the permitted limits.	9/3/2008		
Louisiana Generating (Big Cajun 1, Bayou Cove and Big Cajun 2)	Requesting to operate at reduced levels, if necessary, which may cause emission exceedances over the limits in their air permits.	9/4/2008	Approved. Follow up with written documents as soon as possible.	9/4/2008
Cabot Corporation, Canal Plant (Franklin, Saint Mary Parish)	Requesting a variance for the operation of Nitrogen Oxide (NOx) analyzer which has incurred severe damage due to hurricane Gustav. To continue ensuring compliance with NOx permit limits, Cabot will use a computer modeling based on mass balance calculations over the entire facility which will accurately estimate the quantity of NOx emitted. Results from stack tests and the NOx monitor indicate that the facility operates significantly below the NOx permit limit. The NOx monitor is a requirement under LAC.33.III.501.C.6 therefore is not a requirement under a federal or a specific state regulation. Because of the unique design of the equipment and the logistic limitations due to hurricane Gustav, Cabot anticipates that it will be approximately 6 months before the NOx analyzer will be completely operational as required by the permit. Therefore, Cabot requests that this variance be awarded for 6 months.	9/4/2008	The request was approved for a period of three months. The facility may reassess repair time within this period and revise the timeframe as needed.	9/4/2008

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
Jefferson Parish Landfill	Facility is submitting email notification that the landfill operating hours will be extended to receive debris related to Hurricane Gustav. Jefferson Parish Landfill is currently permitted to operate 12 hours per day Monday through Saturday and a partial day on Sundays. This request is to extend the operating hours from 4:30 am to 8:00 pm Monday through Sunday to accommodate anticipated increases in residential garbage that will resume and debris cleanup efforts. The facility asserts that it is equipped with the necessary labor and equipment to receive the waste during the extended hours. This extension is requested through the duration of the Emergency Order issued by the Department.	9/4/2008	The request to extend operating hours was approved. Facility is to provide written notification as soon as possible.	9/4/2008
Murphy Oil Corporation	Providing emergency authorities and responders access to temporary fueling facilities.	9/4/2008	Approved.	9/4/2008
Enterprise Products Operating LLC	Requesting variance for emergency generators.	9/4/2008		
TLA Killona Landfill	Requesting an increase hours of operation	9/4/2008		
Rubicon	Request to bring in 3 generators and variance for unpermitted emissions.	9/4/2008		
North Landfill City of Baton Rouge/Parish of East Baton Rouge	Requesting change in operating hours by adding Sunday from 5:30 am to 3:00 pm.	9/5/2008	Approved.	9/5/2008
East Baton Rouge Renewable Energy Center	Requesting variance to malfunction start-up requirement of 5 days for GCCS. Facility anticipates restarting the GCCS within 12 days after shut-down, by September 12, 2008	9/5/2008	Approved effective today. Complete appropriate paperwork ASAP. Facility is to request enforcement discretion for events that have occurred.	9/6/2008

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
D&J Fill	Requesting to re-open facility on an emergency basis to accept storm debris.	9/5/2008	The request to re-open D&J on an emergency basis to receive storm debris from Hurricane Gustav was DENIED.	9/6/2008
City of New Orleans	City of New Orleans is resuming Hurricane Katrina demolitions in New Orleans and requested protocol for demos related to Hurricane Gustav.	9/5/2008	The City was provided with the following information: Houses and other structures that are "structurally unsound and in imminent danger of collapse" may be demolished as a Regulated Asbestos Containing Material (RACM) demolition immediately. An Asbestos Disposal Verification Form (ADVF) will be required to dispose RACM at Type 1/2 Landfill. Submit Demolition & Renovation Notification Form (AAC-2) within 5 days of phone submittal. For other RACM that are not emergency, submit AAC-2 according to instructions on LDEQ website. RACM demolitions must be conducted following protocol in Appendix C - Asbestos Cleanup Guidance Documents in Twelfth Amended Declaration of Emergency and Administrative Order. LDEQ will provide regulatory oversight. EPA will be conducting perimeter air monitoring. Therefore, demolition contractor must provide same advance notification to both LDEQ and EPA prior to Hurricane Gustav. Note that houses and other structures that have already collapsed due to Hurricane Gustav (no walls standing) are debris removals, not demolitions, whereby no notification to LDEQ is required. However, debris must be handled and disposed according to "Hurricane Gustav-Declaration of Emergency and Administrative Order.	9/6/2008
North Landfill City of Baton Rouge/Parish of East Baton Rouge	Requesting variance to malfunction start-up requirement of 5 days for GCCS. Facility anticipates restarting the GCCS within 12 days after shut-down, by September 12, 2008.	9/5/2008	Approved. Facility to complete appropriate paperwork ASAP and to submit request for enforcement discretion for events that have occurred.	9/6/2008

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
Woodside Landfill and Recycling Center Reliable Landfill, LLC	Notification that vegetative debris, recyclables, and other storm debris will be segregated and staged temporarily with the facility property boundaries for subsequent volume and weight reduction (chipping, grinding, recycling and/or air curtain destruction) prior to final disposal. In addition, a Debris Site Request form will be submitted upon signature by the local governing authority for your approval. Anticipated duration is through the duration of the Emergency Order. Parish forms and quad maps to be submitted by Monday [9/8/08].	9/5/2008	Approved. Facility to submit all required forms as soon as possible, and to keep daily records of estimates of woodwaste received, ground, etc. and report to LDEQ.	9/5/2008 9/6/2008 9/6/2008
Total Petrochemicals USA, Inc. facility in Carville, LA.	The TOTAL facility in Carville is currently utilizing temporary portable emergency combustion engines, including, but not limited to, electrical power generators, firewater pumps, air compressors, and associated fuel tank storage, until a time that normal operations can be restored. All records required by the Declaration of Emergency & Administrative Order – Hurricane Gustav will be maintained as recommended. If necessary, notifications relating to emissions limitations exceedances due to upset will be made in a timely manner. Facility asserts that as electrical power and natural gas supply returns, all pollution control equipment will be returned to service as expeditiously as possible.	9/5/2008		
Enterprise Products Operating LLC Enterprise Gas Processing, LLC Dixie Pipeline Company Acadian Gas, LLC K/D/S Promix, L.L.C.	Notification of use of temporary and permitted generators during the recovery process following Hurricane Gustav. Power has been restored to several of the locations, but others will be without supplied power for many more days.	9/5/2008		

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
Valero Refining	Valero Refining is requesting that its Title V and PSD public comment period be extended until close of business Friday, September 12, 2008.	9/8/2008	Amended Emergency Order signed 9/6/08 including following language: "Any public comment period ending between August 29, 2008 and September 15, 2008 for facilities located in the parishes of the emergency declaration are hereby extended through September 26, 2008."	9/8/2008
Cleco - multiple facilities throughout La.	Cleco is reporting that they had gray water discharges due to Hurricane Gustav and that those discharges will continue until the restoration effort is complete. The current locations of the discharges are: Showers: DeRidder Fairgrounds, DeRidder LA ; McKesson, Alexandria, LA; LA Youth Education Center, Bunkie, LA; Food Preparation: Northwood Mall, Slidell, LA ; Northwest Community Center, Eunice, LA; Old Wal-Mart,, New Iberia, LA; Cypress Bayou Casino, Franklin, LA; Bay Hills, Bunkie, LA; Buhlow Lake, Pineville, LA; Fair grounds, DeRidder, LA. Per the "Declaration of Emergency & Administrative Order" for Hurricane Gustav, the facility asserts that it will send LDEQ the final detailed information for the gray water discharges by October 15, 2008.	9/8/2008	The facility was instructed to follow the conditions stated in Section 1.i (page 5) of the Emergency Order and submit specifics by October 15, and to include the agency interest (AI) number or permit number if available.	9/8/2008
North Landfill City of Baton Rouge/Parish of East Baton Rouge	Requesting change in operating hours from 5:30 am to 7:00 pm seven days a week until further notice.	9/8/2008	Approved	9/9/2008

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
Plaquemine Deep Well Facility	Facility reporting a problem with storm water buildup at the Plaquemine Deep Well Facility. The facility does not have an LPDES discharge permit nor does it possess a storm water management permit. Storm water was historically deep welled but now the well is undergoing closure, it cannot be utilized to dispose of the accumulated hurricane storm water. The area around the deep well within the containment zone of the RCRA Subtitle C Permit has undergone surface closure. This area is bermed and has accumulated hurricane storm water. The facility requests to reduce the free board within the containment area, particularly in light of Ike, and requests to immediately begin discharge under the Emergency Declaration and Order Provisions signed By Secretary Leggett last week. Facility requests guidance on the applicability of the Emergency Declaration to their particular emergency issue and the appropriate LADEQ notification and recordkeeping requirements connected with this emergency discharge.	9/8/2008	Approved.	9/9/2008
Motiva-Norco	Request for enforcement discretion	9/8/2008	For any noncompliance issues related to the Consent Decree, the facility needs to submit a request for <i>force majeure</i> per the provisions of the consent decree. For future events where the facility anticipates that there may be noncompliance issues (start-up from the hurricane shutdown for example) the facility should submit a variance request. For water quality issues, the facility is to follow the upset and bypass provisions per the regulations. If specific noncompliance issues that have already occurred and resulted from Hurricane Gustav are identified concerning water quality issues (such as missed sampling) or non Consent Decree air quality issues, the facility should request enforcement discretion for those identified specific events. The facility can submit requests for enforcement discretion. LDEQ will review specific requests for enforcement discretion and respond as appropriate.	9/9/2008

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
Syngenta Crop Protection, Inc.	Operation of temporary portable combustion engines did occur as the result of Hurricane Gustav. Operation of permitted internal combustion engines in excess of permitted limits did occur as the result of Hurricane Gustav. Throughput of gasoline in excess of permitted limits may occur as a result of Hurricane Gustav. This is an annual number and Syngenta will not know for certain until the end of the year. Syngenta will submit a report providing more details regarding these activities by October 15, 2008.	9/8/2008		
Chevron Pipe Line Co - Empire-Ostrica Terminal Plaquemines Parish	Requesting emergency variance to allow the uncontrolled loading of crude oil until the vapor recovery facilities have been repaired.	9/8/2008		
Chevron Pipe Line Co - Fourchon Terminal Lafourche Parish	Requesting emergency variance to allow the uncontrolled storage and transfer of crude oil until the vapor recovery facilities have been repaired.	9/8/2008		
Conoco Phillips Company - Alliance Refinery	Requesting permission to operate the following equipment without certain emissions control equipment: - Low and High Pressure Flares (308F-D-1&2/2779-V1): Due to Hurricane Gustav affecting the boilers, these flares may have visible emissions of PM during re-commissioning; therefore, the flares may be operated for a period of time without steam assistance for visible emissions control. - Wastewater Treatment Plant (308W): The wastewater treatment plant steam strippers are non-operational due to Hurricane Gustav and as such, VOC emissions from the wastewater treatment plant may potentially occur above the state permit limits in permit No. 1870-V0. - Fuel Tanker Truck Loading (303-Utilities/2778-V0): Alliance Refinery is providing fuel (gasoline and diesel) to assist in local area recovery efforts. Variance request is for 6 months.	9/8/2008		

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
AT&T - multiple locations throughout state of Louisiana	Notification of the usage of multiple portable emergency engines throughout the state of Louisiana for use for telecommunications during the storms and the aftermath.	9/8/2008		
ExxonMobil Lubricants & Petroleum Specialties Company	Notification of emergency discharge events consisting of untreated storm water from its North and South Tank Fields due to excessive amounts of rainfall associated with Hurricane Gustav.	9/8/2008		
Gordon's Disposal, LLC	Requesting confirmation that LDEQ has concluded that the handling of vegetative debris resulting from hurricanes or other natural disasters by Gordon's Disposal, LLC at its facility located in Iberia Parish in compliance with the operational conditions set out in the letter to Mayor Curry dated September 7, 2008, whether during or after the expiration of the 90-day period described in the said letter, does not violate Louisiana Revised Statute 30:2159.	9/9/2008	Gordon's Disposal, LLC, may recycle vegetative debris in accordance with the debris management plan and the letter of September 7, 2008, provided there are no objections from the FAA and the facility complies with all conditions set forth. Beneficial reuse or recycling of vegetative debris which does not result in disposal of said material is not prohibited by L.R.S. 30:2159. However, there may be other federal, state or local authorizations, requirements and guidance that apply to this activity and the facility is required to comply with any such applicable requirements.	9/9/2008
Gordon's Disposal	Facility requesting permission/authority to dispose of C&D debris.	9/9/2008	Request denied.	9/13/2008
Entergy	Requesting usage of replacement generator for existing generator which failed during Hurricane Gustav and is in need of major rebuild. The emissions will be similar to the existing unit.	9/10/2008	Approved.	9/10/2008
Natural Resources Recovery, Inc., Ronaldson Field (NRRI)	NRRI requesting variance to operate Ronaldson Field during extended hours from 6 a.m. to 8 p.m. seven days for the duration of the recovery.	9/10/2008	Approved.	9/10/2008

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
Little Gypsy Unit 2	Variance request is needed as Hurricane Gustav and Ike have limited the natural gas supply from suppliers as the gas producing platforms in the Gulf of Mexico have shut down. Request variance in accordance with LAC 33:III.917 to allow an exception to specific requirements 57 and 77 or Title V permit 2520-00009-VI reference LAC 33:III.1101. and require opacity to be less than 20 %...	9/11/2008	Request Approved	9/12/2008
Valero-St. Charles	Facility reports difficulties in managing refinery fuel gas due to startup difficulties by consumers of Valero's excess low sulfur gas. In order to flare this excess fuel gas up to the criteria pollutant limits listed in permit, the facility is requesting a variance to use flares at 600 MMBTU/hr vs. permitted 144 MM BTU/hr	9/12/2008	No excess emissions will occur. Variance approved. Facility to submit appropriate paperwork ASAP.	9/12/2008
Shell Chemical LP, Geismar Plant	PDO Unit: requesting emissions variance for 3 tanks (T-PD1901, T-PD1916, T-PD1904) that typically vent to COMFAC Flare (EPN 36A-97) that need to be restored before the flare can be restarted; tanks are idle but not empty and there may be breathing losses that are not currently being controlled by the flare. EOEG-2 Unit: requesting variance for the level instrumentation of the Ethylene Oxide (EO) storage vessels and the EO circulation loops. Currently the vent scrubbers are not operational due to power and utility loss associated with Hurricane Gustav. COGEN Unit: requesting variance for NOx RACT regulatory requirements; "turndown" requests restrict operation of the Cogeneration Units and can lead to excess NOx emissions. Shell anticipates starting initial operations possibly by 9/12/08, and up to 4 weeks for start-up.	9/12/2008		

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
Shell Geismar	Facility notifying of clarifier and biotreater problems; upset conditions reported to LDEQ. Requesting variance for new permit requirements or permit effective date extension.	9/12/2008		
Riverside Recycling (formerly Industrial Pipe, Inc.)	Requesting variance for a general deviation to authorize receipt of hurricane-generated debris via vessels in accordance with §2.e of the "Declaration of Emergency and Administrative Order" issued 9/1/08. <u>Updated 9/8/08</u> - Riverside intends to manage hurricane-related vegetative debris in accordance with its referenced Dept. of Agriculture and Forestry BMP. Riverside will evaluate the potential for heat generation in the compost piles, and take steps to mitigate excessive heat build-up. <u>Updated 9/10/08</u> Material has been sent elsewhere and the earlier request/notification is hereby withdrawn.	9/8/2008 9/10/08	Request withdrawn...no action by LDEQ needed.	9/10/2008
Baton Rouge Propylene Concentrator Unit and ExxonMobil	Requesting a variance for the following estimated emissions from the flare, emission point M-01: 2000 pounds ethylene 1500 pounds propylene <u>Amended 9/10/08</u> - requesting to amend variance to double the emissions but half the daily rate.	9/8/2008 9/10/08	Approved - get follow-up ASAP Amended 9/11/08: approved	9/8/2008 9/11/08
BASF	Requesting variance for NOx emissions from Cogen Unit #2.		Verbal approval.	9/3/2008

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
CII Chalmette	Requesting variance to vent through the Pyroscrubber stack. The new permit, when issued, would allow up to 500 hours per year of venting through the stack.		<p>Approved subject to the following conditions:</p> <ol style="list-style-type: none"> 1. Rain CII Carbon shall make all reasonable attempts to repair the boiler as soon as practicable or implement temporary measures to minimize the amount of time the boiler vents through the pyroscrubber stack. A description of each repair attempt or temporary measure employed and the dates of such attempts shall be submitted to the Office of Environmental Services, Air Permits Division, by October 31, 2008. 2. Emissions from the pyroscrubber stack shall be limited to the following: <ol style="list-style-type: none"> a. opacity: <= 20%, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes. b. TSP: <= 42.06 lb/hr c. TSP: <= 0.6 lb/MMBTU of heat input 3. During the variance period, monitor and record the total number of hours the pyroscrubber vents through the pyroscrubber stack. Make records available for inspection by DEQ personnel. These records shall be submitted to the Office of Environmental Services, Air Permits Division, by October 31, 2008. 	9/7/2008
Rhodia, Inc.	Requesting extension of time for public comment period and public hearing on draft RCRA permit.			

**IN THE MATTER OF
HURRICANE IKE**

AGENCY INTEREST NO. 160462

AND ITS AFTERMATH

DECLARATION OF EMERGENCY AND ADMINISTRATIVE ORDER

Pursuant to the authority granted to me by Louisiana Revised Statutes 30:2001 *et seq.*, and particularly La. R.S. 30:2033 and 2011(D)(6), I hereby make the following findings, declaration and order:

FINDINGS AND DECLARATION

1. On or about the 13th day of September, 2008, Hurricane Ike (hereinafter “the Hurricane”) is expected to make landfall on the coast of Louisiana, causing widespread damage within the State of Louisiana.
2. By State of Louisiana Proclamation No. 52 BJ 2008, Louisiana Governor Bobby Jindal declared on September 7, 2008, that a state of emergency exists in the state of Louisiana, as the Hurricane is expected to impact the coastal parishes of Louisiana with hurricane strength winds, wave surges, high tides, torrential rain and tornado activity, threatening the lives and property of the citizens of the State of Louisiana.
3. The parishes in which local government and/or the Governor has declared or declares an emergency shall constitute the specific areas covered by this Declaration of Emergency and Administrative Order (hereinafter “Order”). These areas shall herein be referred to as the “Emergency Areas.”
4. I find that the Hurricane has created or will create conditions that require immediate action to prevent irreparable damage to the environment and serious threats to life or safety throughout the Emergency Areas.

WHEREFORE, I hereby declare that an emergency exists, and that the following measures are necessary to prevent irreparable damage to the environment and serious threats to life or safety throughout the Emergency Areas.

ORDER

Within the Emergency Areas:

§ 1. Wastewater Treatment Systems

- a. Upset Provisions

Permittees with Louisiana Pollutant Discharge Elimination System (LPDES) permits should consider activating the upset provisions in their permits. LAC 33:IX.2701.N.1 defines upset as the following:

An exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

An upset constitutes an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limitations if the requirements of LAC 33:IX.2701.N.3 are met. This Order extends upset provisions to include water quality based effluent limitations. For upsets caused by this hurricane, the 24-hour oral notification is waived unless the non-compliance may endanger human health.

b. Authorization is hereby granted to discharge water placed in storage tanks or other containers or vessels for the purpose of stabilization, provided that the tanks, containers or vessels had been emptied of their previous contents prior to filling with the water. To the extent practicable, discharges should not contain free oil, hydrocarbons or other pollutants in other than trace amounts. No free oil shall mean that the discharge shall not create a visible sheen. Water that accumulates in storage tanks, containers or vessels as a result of rainfall, flooding or tidal surge may be discharged under the same conditions.

c. Appendix A sets forth guidance to operators of sanitary wastewater treatment systems to aid in the return to compliant operations to prevent further damage to the environment and serious threats to life or safety throughout the Emergency Areas.

d. Discharges from Potable Water Treatment Systems

The discharge of pollutants from all potable water treatment systems is subject to the Louisiana Pollutant Discharge Elimination System (LPDES) General Permit for potable water treatment plants. Under ordinary circumstances, LDEQ requires the submission of a complete Notice of Intent to Discharge, and evaluation and response from LDEQ prior to commencement of discharge.

However, to alleviate shortages of potable water in the Emergency Areas, authorization is hereby granted for new discharges of wastewaters associated with potable water treatment systems in the Emergency Areas, and the requirement for submission of a Notice of Intent to Discharge, evaluation and response from LDEQ is hereby waived. Any such discharges must comply with LPDES Permit LAG380000, Potable Water Treatment Plant General Permit. The General Permit effluent limitations and requirements can be viewed at <http://www.deq.louisiana.gov/portal/portals/0/permits/lpdes/LAG380000.pdf>. A copy of the General Permit can be obtained by calling the Office of Environmental Services at (225) 219-3181.

Deadlines for monitoring and reporting requirements are addressed in Section 14 of this Order.

Authorization to discharge pursuant to this Order shall terminate upon the expiration of this Order. Any facility owner or operator requiring continued coverage under the General LPDES Permit subsequent to the expiration of this Order shall submit a Notice of Intent to Discharge from a Potable Water Treatment Plant to the Department by the expiration date of this Order. The application form, H2O-G, can be found at <http://www.deq.louisiana.gov/portal/Default.aspx?tabid=1837>, or by calling the Office of Environmental Services at (225) 219-3181.

Any owner or operator who commences discharge of pollutants from a portable potable water treatment unit pursuant to this Order shall submit written notification to the Office of Environmental Services at P.O. Box 4313, Baton Rouge, LA 70821-4313, within five (5) days of the commencement of the discharge.

e. Discharges from Temporary Housing Locations

Guidelines pertaining to sanitary discharges related to temporary housing sites are provided in Appendix B of this Declaration.

f. Gray Water Discharges

The Department hereby authorizes discharges of gray water within the Emergency Areas that comply with the requirements set forth in Appendix C.

g. Storm Water Discharges

i. U.S. Army Corps of Engineers

The Department hereby authorizes the U.S. Army Corps of Engineers to discharge storm water runoff from construction activities related to hurricane response activities in the Emergency Areas. Best Management Practices to avoid erosion and offsite transport of sediments are to be implemented to the greatest extent practicable. The Storm Water General Permit For Construction Activities Five (5) Acres Or More (LAR100000) can be accessed at <http://www.deq.louisiana.gov/portal/Portals/0/permits/lpdes/LAR100000.pdf>, and contains applicable Best Management Practices for erosion and sediment controls in Part IV. Storm Water Pollution Prevention Plans.

ii. Electrical and Communications Utility Companies

The Department hereby authorizes public utility companies providing electricity or communications services to discharge storm water runoff from construction activities related to hurricane response activities

in the Emergency Areas, including restoration of electrical and communication services. Best Management Practices to avoid erosion and offsite transport of sediments are to be implemented to the greatest extent practicable. The Storm Water General Permit For Construction Activities Five (5) Acres Or More (LAR100000) can be accessed at <http://www.deq.louisiana.gov/portal/Portals/0/permits/lpdes/LAR100000.pdf>, and contains applicable Best Management Practices for erosion and sediment controls in Part IV. Storm Water Pollution Prevention Plans.

h. Biosolids Land Application Projects/Sites Management:

i. If flooding should occur as a result of a hurricane, land application of Class B Biosolids should not take place at land application sites.

ii. Land application of a Class B Biosolids at sites should not resume until flooding has subsided and the water table is below two (2) feet.

iii. Facilities which prepare Exceptional Quality (EQ) Biosolids should re-prepare/retreat EQ Biosolids or dispose of the EQ Biosolids in a permitted landfill if the EQ Biosolids are stored on-site and subjected to hurricane flooding.

iv. Facilities utilized to prepare sewage sludge to EQ Biosolids should halt operation during a hurricane and should not resume operation until the flooding has subsided and the facility has been properly cleaned.

For additional information, contact Kilren Vidrine, LDEQ, Office of Environmental Services, Water Permits Division, 225-219-3012.

i. Acceptance of sewage sludge:

i. Operators of wastewater treatment facilities who are not already authorized by permit to do so are hereby authorized to accept hauled sewage sludge (as defined at LAC 33:IX.7301.B), provided that the following criteria exist:

a. Acceptance of the sewage sludge is necessary to facilitate hurricane recovery (e.g., by preventing septage from backing up in homes or by preventing lift stations from overflowing or otherwise malfunctioning). This authorization does not apply to the routine pumping of septic tanks, portable toilets, marine sanitation devices, or holding tanks not related to the hurricane recovery;

b. The wastewater treatment facility can handle the hauled sewage sludge without contributing to adverse effects on human health or the environment or impeding recovery of the treatment facility itself; and

c. The operator immediately notifies the LDEQ Water Permits Division of the acceptance of the sewage sludge, by telephoning Melvin Mitchell or Kilren Vidrine, at (225) 219-3013, and provides written notification within thirty (30) days to the Office of Environmental Services, Water Permits Division, P.O. Box 4313, Baton Rouge, Louisiana 70821-4313, or by e-mail to mitch.mitchell@la.gov or kilren.vidrine@la.gov.

j. For all discharges authorized under this Order, the following conditions apply:

i. The owner/operator shall notify the Office of Environmental Services, Water Permits Division by no later than September 19, 2008, that a discharge has occurred or is anticipated.

ii. For each discharge, the owner/operator shall record the location of the discharge, the date and time the discharge commenced and ceased, the approximate volume of the discharge, any known or suspected pollutants present in the discharge and the receiving water body. The specific type of discharge and a reference to the specific section(s) of this Order authorizing the discharge shall be included. These records shall be kept on-site and available for inspection by the Office of Environmental Compliance, Surveillance Division and reported to the Office of Environmental Services, Water Permits Division by no later than thirty days after the expiration of this order .

iii. The owner/operator shall take all practicable measures to minimize the volume and duration of the discharge.

iv. The owner/operator shall take all practicable measures to prevent or minimize erosion due to the discharge and any other potential impacts on the receiving water body.

v. All discharges authorized under this Order are solely for the purpose of protecting human health and property and to facilitate rescue and recovery efforts.

§ 2. Solid Waste Management

a. Owners and operators of solid waste management facilities and local governments should consult and adhere to the State of Louisiana "Comprehensive Plan for Disaster Clean-up and Debris Management," revised August 2006 edition (Debris Management Plan), which appears as Appendix D, except where the Debris Management Plan may be in conflict with the provisions of this Order. In the event of conflict, the provisions of this Order shall prevail.¹ Provisions of the Debris Management Plan not specifically allowed

¹ For example, the definition of "construction and demolition debris" in the Debris Management Plan includes "furniture, carpet, painted or stained lumber contained in the demolished buildings." These are not, pursuant to the terms of this Order, permissible for disposal in a Type III (C&D) landfill.

under this Emergency Order include the expanded definition of Construction and Demolition Debris, references to enhanced Construction and Demolition Debris Landfills, and burning of C&D debris.

i. Ash residue from the combustion of yard trash or clean wood waste shall be disposed of in accordance with the Debris Management Plan.

ii. Vegetative debris shall be managed in accordance with the Debris Management Plan. The Department may authorize disposal of vegetative debris containing incidental, *de minimus*, or trace amounts of contamination in a Type II or III landfill on a case-by-case basis.

iii. Putrescible waste (e.g., rotting food that has been removed from unsalvageable refrigerators and freezers) shall be disposed of in a permitted Type II landfill in accordance with the Debris Management Plan.

iv. The disposal of excessive accumulations of small animal carcasses shall be in accordance with the Louisiana Department of Health and Hospitals sanitary code and the Debris Management Plan. The disposal of large animal carcasses (e.g. horses, cows) shall be in accordance with the instructions from the Louisiana Department of Agriculture and the Debris Management Plan.

b. Owners and operators of solid waste management facilities permitted by the Department before the Hurricane are authorized to make all necessary repairs to restore essential services and the functionality of stormwater management and leachate collection systems damaged by the Hurricane, without prior notice to the Department. Within thirty (30) days of commencing the work of such repair or replacement, however, the permittee shall notify the Department in writing, describing the nature of the work, giving its location, and providing the name, address, and telephone number of the representative of the permittee to contact concerning the work.

c. Uncontaminated construction and demolition debris may be disposed of in a permitted Type III landfill. On a case-by-case basis, the Department may authorize disposal of construction and demolition debris containing incidental, *de minimus*, or trace amounts of contamination in a Type III landfill. Uncontaminated construction and demolition debris may be managed at a temporary staging area authorized by the Department. Uncontaminated construction and demolition debris that is mixed with other uncontaminated hurricane-generated debris, such as white goods or household hazardous waste, should be segregated from other solid waste prior to disposal in a permitted landfill or authorized disposal site, except in cases where segregation is not practicable.

d. White goods (i.e., unsalvageable air conditioners, stoves and range tops, as well as refrigerators and freezers from which food has been removed) shall be stored in an area separate from other solid wastes and shall be stored in a manner that prevents vector and odor problems. No white goods

may be stored at a site without a permit or other written authorization from the Department specifically allowing storage in that area. All white goods shall be removed from the storage facility or staging area and sent offsite for recycling, or recycled onsite, within ninety (90) days of initial receipt at the site.

e. Permitted landfills or transfer stations within or outside of the Emergency Area, which accept hurricane-generated debris in accordance with the terms of this Order, may accept hurricane-generated debris for disposal or storage without the need to first modify existing permits, as follows:

i. Prior notification is submitted to the Department describing any proposed deviations from permit conditions;

ii. any proposed deviations from permit limits must be within the bounds of engineering assumptions used in the design of the facility, and conducted in accordance with the Debris Management Plan (Appendix D); and

iii. Written approval by the administrative authority (including electronic mail) of the proposed deviations is received from the Department.

Operators of landfills or transfer stations approved for permit deviations under this Order may be required to submit application for modifications of their existing permits to address any long-term impacts of accepting hurricane-generated debris on operations and closure that are not addressed in existing permits if it is determined long term impacts will result from these activities. Long-term impacts are those that will extend past the expiration date of this Order. The requests for modification shall be submitted no later than thirty (30) days after expiration of this Order. No permit fee will be required for any modifications necessitated solely by the hurricane clean-up activities. The Department may, for good cause shown, issue a temporary authorization pursuant to LAC 33:VII.511.B.1.a for activities that are addressed in a permit modification request as provided for in this subsection, to authorize operations after expiration of this Order, pending a decision on the modification request.

f. Site Authorizations will be considered in accordance with procedures contained in the Debris Management Plan. Authorizations may be requested by providing a notice to the Department on approved forms (Debris Management Site Form:

<http://www.deq.louisiana.gov/portal/Portals/0/HurricaneGustav/Emergency%20Debris%20Management%20Site%20Form.pdf>; Procedures to Approve Emergency Debris Management Sites:

<http://www.deq.louisiana.gov/portal/Portals/0/HurricaneGustav/Procedures%20to%20Approve%20Emergency%20Debris%20Management%20Sites%20Form.pdf>.

g. Construction and demolition debris generated from residential structures of four units or less that are subject to a government-ordered demolition shall be disposed of in accordance with the Debris

Management Plan (Appendix D), except Regulated Asbestos Containing Material (RACM) shall be disposed of in a Type I/II landfill. A request by a landfill owner or operator for authorization to accept such ACWM must include a certification that the owner or operator will manage the ACWM in accordance with the landfill's QA/QC plan and LDEQ requirements. See Section 6.a, *Asbestos Clean-up*, of this Order, for additional information on receiving ACWM in Type I and II landfills. The Department will provide a written response to the request for authorization to accept solid waste and asbestos containing waste material in a Type I or II landfill.

h. Waste Tires

The Secretary of the Louisiana Department of Environmental Quality finds that the conditions resulting from the Hurricane may cause or contribute to an extraordinary drain on State of Louisiana resources and in particular on the Waste Tire Management Fund (WTMF) provided for in La. R.S. 30:2418. Those conditions include the damaging and/or abandonment of automobiles in the affected areas. It is anticipated that most of these vehicles will be salvaged or scrapped, with the four to five tires on each vehicle being sent for either disposal, resale, and or recycling. This sudden influx of waste tires and used tires into the system may result in an inordinate immediate drain on the WTMF and an inability to properly account for the diversion of tires to recycling projects and for resale. As a result, the Secretary does hereby order the following:

i) All tires removed from vehicles within the affected areas that are salvaged and/or scrapped because of damage resulting from the Hurricane shall be tracked and are ineligible for payment from the WTMF.

ii) All tires that are collected in the affected areas through hurricane debris collection activities and deposited at parish collection centers, if established, will be ineligible for payment of the WTMF subsidy, but are to be treated as debris under existing debris removal programs. Tires must be classified for either recycling under existing approved beneficial uses, or for resale. Any person who claims for resale any tires from salvaged or scrapped vehicles in the affected area shall report to the Department the number of such tires classified for resale, and their destination, within fifteen (15) days.

iii) All tires that are removed from automobiles in the affected area that are destined for salvage because of damage resulting from the Hurricane must be collected, transported, and either recycled or disposed of with an accompanying manifest that lists the tires as being ineligible for the WTMF. If the tires are deemed "used tires" for resale, such a declaration must be reported to the Department by the person responsible for removal of the tires from the vehicle being scrapped and or salvaged. The report must contain the VIN number of the vehicle being scrapped and or salvaged, the number of tires being removed, the number being classified for resale, and the number classified for recycling and/or disposal.

iv) Eligibility of tires for the WTMF subsidy shall be governed by the most current version of this document.

§ 3. Hazardous Waste

a. In accordance with the Debris Management Plan, hazardous waste generated as a result of the hurricane event must be separated from other hurricane-generated waste and disposed of at a permitted hazardous waste disposal facility. Household wastes collected during this event, which are exempt from the regulatory requirements applicable to hazardous wastes, must be managed not only in an environmentally sound manner but also in accordance with the appropriate LDEQ rules and regulations governing the storage and processing of this type of waste.

b. A blanket approval of time extensions under Louisiana Administrative Code 33:V.1109.E.2 is necessary within the Emergency Areas for hazardous waste generators and small quantity generators for the storage of their hazardous wastes on site, pending the cleanup of the hurricane damage and restoration of essential services. The rules authorize a thirty (30) day extension because of unforeseen and uncontrollable circumstances. The specific effects of the Hurricane were unforeseen and uncontrollable. Therefore, to avoid having to issue a potentially large number of individual approvals on a case-by-case basis and waste limited agency resources during the time of emergency, the Department authorizes a general extension of time of thirty (30) days from the expiration of this Order for all such hazardous waste generators and small quantity generators for the storage of their hazardous wastes on site, in the parishes within the Emergency Areas, and where their ninety (90) day accumulation period expires within the term of this Order.

§ 4. Open Burning

a. The Department authorizes local governments or their agents to conduct the open burning of hurricane-generated trees, leaves, vines, twigs, branches, grass, and other vegetative debris within or outside of the Emergency Area, provided that the provisions of LAC 33:III.1109.D.6. are met, and it is consistent with the Debris Management Plan (Appendix D). This Order does not authorize any other outdoor burning of non-listed debris streams. Within seven (7) days of commencing any such burning, the local government or its agent shall notify the Department in writing, describing the general nature of the materials burned, stating the location and method of burning, and providing the name, address, and telephone number of the representative of the local government to contact concerning the work and the anticipated duration of the burning event. This Order does not relieve the local government or the agent from any requirement to obtain an open burning authorization from any other governmental entity empowered to grant such authorizations. Notwithstanding the provisions of this paragraph, the burning of asbestos-containing materials, construction and demolition debris, solid waste (other than vegetative debris) or hazardous waste is prohibited.

b. The Department will consider, on an individual basis, requests for approval for open burning, by persons other than local governments or their agents, of hurricane-generated trees, leaves, vines, twigs, branches, grass, and other vegetative debris. Any such burning approved by the Department must be conducted in compliance with the requirements of LAC 33:III.1109.D.6.

§ 5. Air Pollution Sources Other than Open Burning

a. The Department authorizes the minor repair of any previously permitted stationary source of air pollution that was damaged by the Hurricane to restore it to its previously permitted condition without prior notice to the Department. Within thirty (30) days of commencing such repairs, however, the permittee shall notify the Department in writing, stating the location and nature of the work and providing the name, address, and telephone number of the representative of the permittee to contact concerning the work. Minor repairs are repairs that would not constitute reconstruction under any definition of 40 CFR Part 60 or 63 and that could not affect potential to emit any pollutant, and that would not constitute a violation of any other provision of the NSPS, MACT, or NESHAP standards. Repairs that would constitute reconstruction under any definition of 40 CFR Part 60 or 63, or repairs that could affect potential to emit any pollutant are not authorized by this Order.

b. The Department will consider, on an individual basis, requests for approval for, but not limited to, the following sources of air pollution:

i) temporary air pollution control devices, such as portable flares, used for vessel and pipeline segment purging and the limited operation of facilities with damaged vapor control equipment;

ii) portable storage tanks, used for interim storage while damaged equipment is being repaired; and

iii) repairs, other than the minor repairs addressed in Section 5.a above, of permitted stationary sources that have been damaged by the Hurricane, provided that the sources are restored or replaced with equipment that is identical or the functional equivalent, to meet permit conditions.

Requests should be directed to the Office of Environmental Services, Air Permits Division.

c. The Department authorizes temporary gasoline and diesel fueling stations at regulated industrial facilities for the express purpose of refueling onsite vehicles essential for plant operations, vehicles of employees, and local emergency authorities and responders.

d. The throughput of any temporary gasoline storage vessels used exclusively for providing gasoline to employees of the tank operator and local emergency authorities and responders will not be counted toward the annual or thirty (30) day average throughput for purposes of determining the applicability of control requirements under LAC 33:III.2131. This subparagraph applies only to gasoline

provided to employees at or below the operator's cost. This subparagraph does not exempt the operator from any other applicable regulatory requirements, specifically including, but not limited to, the spill prevention and control requirements of the Louisiana Water Quality Regulations (LAC 33: Part IX).

e. LAC 33:III.507.J.2 provides that an upset condition constitutes an affirmative defense to an action brought for noncompliance with technology-based emissions limitations. LAC 33:III.507.J.2.d requires the permittee to notify the Department no later than two (2) working days after the time emissions limitations were exceeded due to the upset. Because of the circumstances caused by the Hurricane and the need to apply facility resources to quickly repair and correct conditions caused by the upset, the Department extends the notification requirement referenced above to seven (7) days.

f. The Department authorizes the use of temporary portable emergency internal combustion engines, including, but not limited to, electrical power generators, firewater pumps, and air compressors, and the associated fuel storage tank, until such time as normal operations are restored or until the expiration of this Order, whichever is earlier.

i) The owner/operator shall notify the Office of Environmental Services, Air Permits Division by no later than September 19, 2008, that operation of temporary portable combustion engines has occurred or is anticipated.

ii) Emergency engines shall be fueled by natural gas, gasoline, diesel, or fuel oil that contains less than 0.5 weight percent sulfur.

iii) Emergency engines shall comply with all *applicable* requirements of 40 CFR 60, Subpart IIII—Standards of Performance for Stationary Compression Ignition (CI) Internal Combustion Engines; 40 CFR 60, Subpart JJJJ—Standards of Performance for Stationary Spark Ignition (SI) Internal Combustion Engines; and 40 CFR 63, Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines.

iv) Each facility subject to LAC 33:III.919 shall include emissions from all such emergency engines in its annual emissions statement.

v) For each temporary emergency engine, the owner/operator shall record the date the unit is delivered; its make, model, and manufacturer's rated horsepower; the fuel type; total operating time; and the date the unit was removed from the site. These records shall be kept on-site and available for inspection by the Office of Environmental Compliance, Surveillance Division and reported to the Office of Environmental Services, Air Permits Division by no later than thirty days after the expiration of this Order.

g. For permitted internal combustion engines operated in direct response to the Hurricane, including, but not limited to, electrical power generators, firewater pumps, and air compressors, the Department suspends any limitations on operating time imposed by the applicable permit until such time as normal operations are restored or until the expiration of this Order, whichever is earlier. Emissions from the operation of such engines operated pursuant to this Order shall not count toward applicable ton per year limitations. All other provisions applicable to the engines shall continue to apply.

i) The owner/operator shall notify the Office of Environmental Services, Air Permits Division by no later than September 19, 2008, that operation of permitted internal combustion engines in excess of permitted limits has occurred or is anticipated. Relevant emission point and permit numbers should be included in this correspondence.

ii) A report summarizing the operating time of permitted internal combustion engines in direct response to the Hurricane and the resultant criteria and toxic air pollutant emissions shall be submitted to the Office of Environmental Services, Air Permits Division by no later than thirty days after the expiration of this Order.

h. The Department suspends applicable limitations on throughput and emissions imposed on fuel loading racks by air quality permits through the expiration of this Order in order to maximize fuel availability in response to the Hurricane. Emissions from loading operations during this period shall not count toward applicable ton per year limitations.

i) The owner/operator shall notify the Office of Environmental Services, Air Permits Division by no later than September 19, 2008, that throughput in excess of permitted limits has occurred or is anticipated. Relevant emission point and permit numbers should be included in this correspondence.

ii) A report summarizing the throughput in excess of permitted limits and the resultant criteria and toxic air pollutant emissions shall be submitted to the Office of Environmental Services, Air Permits Division by no later thirty days after the expiration of this Order.

§ 6. Asbestos Clean-up

a. Asbestos clean-up shall be conducted in accordance with the Debris Management Plan. The Department waives the requirement for prior notification for emergency demolition or emergency cleanup of asbestos-containing material that is structurally unsound and in danger of imminent collapse resulting from the Hurricane. Within one (1) business day of commencing such demolition or cleanup, however, the person responsible for such work being undertaken by order of state or local government shall notify the Department in writing. The notification shall be submitted on the Asbestos Notification of Demolition or Renovation Form AAC-2, which may be found at <http://www.deq.louisiana.gov/portal/tabid/2883/Default.aspx>. The procedures

in LAC 33:III.5151 (demolition/renovation) and LAC 33:III.Chapter 27 (accreditation and training requirements) for handling asbestos-containing material shall be complied with during demolition, cleanup, transportation, and disposal, except as otherwise provided herein. Construction and demolition debris generated from residential structures of four units or less that are subject to a government ordered demolition (if ordered) and that are assumed to contain potential asbestos-containing waste material shall be disposed of in a permitted Type I or II landfill. The Department will provide a written response to any request for authorization for a Type I or II landfill to dispose of asbestos containing waste material. Burning and grinding of asbestos-containing material is prohibited.

b. The Department waives the requirement pursuant to LAC 33:III.2799.E.2.b.ii, that applicants receiving training from providers not recognized by the State of Louisiana also submit proof of training in current Louisiana asbestos regulations (see LAC 33:III.2799.F.5.g).

c. The Department waives the requirement pursuant to LAC 33:III.2799.F.5.c.i that recognized asbestos Training Providers give the Department notice at least five (5) days prior to class commencement. (Notification must be made at least three (3) days prior to a course when only the state regulations are to be taught.) Notice shall be provided to the Department within twenty-four (24) hours of class commencement.

d. Local education agencies and state government may make emergency use of a building as a school or state building. The agency making use of the building may request an extension of the deadline to inspect the building within four (4) months of the decision to use the building pursuant to LAC 33:III.2707.A.2.

e. The Department waives the requirement pursuant to LAC 33:III.2723.A.2 that the local education agency or state government must submit a management plan prior to any building's use as a school or state building. A management plan shall be submitted within six (6) months of the initial use of the building.

f. In addition to the qualifications established by LAC 33:III.2799.D.3, the Department may accredit as an "abatement project designer" any individual who:

i) has a Bachelor of Science in a related scientific field with five (5) years experience as a Contractor/Supervisor working under the direction of a Louisiana Accredited Project Designer, planning and implementing asbestos abatement projects;

ii) has at least ten (10) years experience as a Contractor/Supervisor working under the direction of a Louisiana Accredited project Designer, planning and implementing asbestos abatement projects; and

iii) has completed an application developed by the Department, and received signatures from two (2) Louisiana accredited Project Designers indicating that the applicant has the knowledge and skills to perform this type of work.

g. The fee charged for the Emergency Processing of Worker Accreditation for Asbestos (i.e., LAC 33:III.223, Fee #2070) shall be reduced to \$66.00 (i.e., the same fee as for normal processing, Fee #2060).

h. The duration of worker, contractor/supervisor, and inspector initial and refresher training courses is specified in numbers of days. A day of training may equal nine or ten consecutive hours, including breaks and lunch. For example, a 32-hour worker class may be taught in 9-hour days, reducing the class time on the fourth day by six (6) hours, a 40-hour contractor/supervisor class may be taught in 10-hour days, reducing the class time to four (4) days, and a 24-hour inspector class may be taught in 10-hour days, reducing the class time to 2.5 days.

i. The fee charged for the Emergency processing of Asbestos Notification of Demolition and Renovation Form AAC-2 (i.e. LAC 33:III.223, Fee code # 2030) shall be reduced to \$66 (sixty-six dollars) for hurricane related demolition of residential structures of four (4) units or less, subject to a government ordered demolition.

The Department shall generate a single Asbestos Disposal Verification Form ("ADVF") per day, per landfill, per contractor for use with multiple loads of C&D debris that contains asbestos containing waste material, notwithstanding any provision to the contrary in LAC 33:III.5151.F.2.g. The Department will also generate a blank "Addendum to ADVF for Transportation and Disposal of AWCM," which will accompany the ADVF and which is to be completed and signed by the contractor and landfill operator. Detailed instructions and a sample Addendum are available on the Department's Website at <http://www.deq.louisiana.gov/portal/tabid/2885/Default.aspx> under ****Special Interest - Hurricane Related: Please Take Note**** or by contacting the Permit Support Services Division, Notifications and Accreditations Section, at 225-219-0789.

§ 7. Underground Storage Tanks

Before placing any hurricane impacted Underground Storage Tank (UST) system back in operation, and no later than ninety (90) days after hurricane related conditions permit, the owner and/or operator shall perform an emergency evaluation of the UST system. The evaluation shall consist of, at a minimum, a general inspection of the UST system, followed by performing the start up protocol contained in Appendix F, "Plan For Evaluating Underground Storage Tank Sites Impacted by Hurricane Ike." Before placing fuel into any UST system that has been damaged or has sustained a release, the owner/operator must repair or replace the

UST system, perform precision tank and line tightness tests and leak detection system tests, and provide a fully functional corrosion control system.

During the time that the UST system is not accessible due to conditions resulting from the Hurricane, the owner/operator of the UST system is relieved of the requirements for release detection, corrosion protection, and inventory control. Each owner/operator shall report any suspected UST releases to the Department within seven (7) days of gaining knowledge of the suspected release, unless an emergency condition makes it impossible for the owner/operator to do so, in which case the owner/operator shall report the suspected release to the Department as soon as he/she is able. All recordkeeping requirements for inoperable systems are suspended during the time of this Order. During the time of this Order, in the areas affected by the Hurricane, non-compliance with release detection, corrosion protection, and inventory control for UST owners and operators will not constitute non-compliance for purposes of the deductibles enumerated in La. R.S. 30:2195.10.

§ 8. Special Waste (Reuse and Recycle)

Every effort should be made to minimize the disposal of reusable and recyclable material in landfills as noted in the Debris Management Plan (Appendix D). Appendix G lists special waste from specific sources (households, businesses, schools, public buildings, automobiles and boats) and references the FEMA Debris Plan, which provides information intended to assist operators of solid waste facilities, recycling centers, scrap metal dealer, local governments, and contractors in handling of certain debris from the Emergency Areas.

§9. Public Notice and Public Participation Procedures Regarding Proposed Permit Actions

Any public comment period ending between September 11, 2008 and September 19, 2008 for facilities located in the parishes of the emergency declaration are hereby extended through September 26, 2008.

Public Hearings scheduled in the Emergency Areas will be evaluated on a case by case basis depending on local conditions.

Updates will be provided on the Department's website and press releases will be prepared if a public hearing is postponed.

Appendix H provides special procedures for public notice and public participation regarding proposed permit actions in the Emergency Areas that may be activated in the event of prolonged or extensive interruption of newspaper services in the impacted areas. These procedures for comment period

extension and revised public notice requirements may be revised after a full impact assessment is completed.

§ 10. Records Management

Hard copy or electronic copies of files associated with environmental issues for your facility may be available at the Department. Files destroyed by the Hurricane can be obtained by the Responsible Persons for your system from the Department free of charge. Please contact Records Management at (225) 219-3172 or online at <http://www.deq.louisiana.gov/pubRecords/>.

§ 11. General Conditions

a. This Order does not convey any property rights or any rights or privileges other than those specified in this Order.

b. This Order only serves as relief for the duration of this Order from the regulatory and proprietary requirements of the Department, and does not provide relief from the requirements of other federal, state, and local agencies. This Order therefore does not negate the need for the property owner or facility operator to obtain any other required permits or authorizations, nor from the need to comply with all the requirements of those agencies.

§ 12. General Limitations

The Department issues this Order solely to address the emergency created by the Hurricane. This Order shall not be construed to authorize any activity within the jurisdiction of the Department except in accordance with the express terms of this Order. Under no circumstances shall anything contained in this Order be construed to authorize the repair, replacement, or reconstruction of any type of unauthorized or illegal structure, habitable or otherwise.

§ 13. Other Authorizations Required

Nothing in this Order shall eliminate the necessity for obtaining any other federal, state, or local permits or other authorizations that may be required.

§ 14. Extension of Time to Comply with Specified Deadlines

a. For facilities regulated by the Department in the Emergency Area, this Order extends the time for a period of thirty (30) days to comply with the following specified deadlines that occur between September 12, 2008, and the expiration of this Order:

i. The time deadlines to conduct or report periodic monitoring required by permits, other authorizations, enforcement actions, or settlement agreements, except for monitoring required by air permits issued under Title IV or V of the Clean Air Act or under the PSD program;

ii. The time deadlines to submit the reports required by 40 CFR Part 70 General Conditions K and R.3.b of air permits issued under Title V of the Clean Air Act and Louisiana Air Emission Permit General Condition XI.C.2 for all air permits; and

iii. The time deadlines to file an application for renewal of an existing permit, except for air permits issued under Title V of the Clean Air Act.

b. Permittees with LPDES permits unable to sample or conduct analyses required by their permit shall document missed sample events and attempts to conduct sampling/analyses in accordance with their permit. Permittees shall submit this information with the Discharge Monitoring Reports.

§ 15. Completion of Authorized Activities

All activities authorized under this Order must be commenced before the expiration of this Order unless otherwise provided in an authorization or permit. The deadline for commencement under any authorization or permit issued under this Order may be extended on a showing that contractors or supplies are not available to commence the work, or if additional time is needed to obtain any required authorization from the Federal Emergency Management Agency, the U.S. Army Corps of Engineers, or other local, state, or federal agencies.

§ 16. Amendments

This Order may be amended as required to abate the emergency.

§ 17. Expiration Date

This Declaration of Emergency and Administrative Order shall take effect immediately upon execution by the Secretary of the Department, and shall expire sixty (60) days from the date of execution set forth below, unless modified or extended by further order.

Signed by Secretary Harold Leggett, Ph.D. on the 12th day of September, 2008.

NOTE: Appendices A through H for the Declaration of Emergency and Administrative Order for Hurricane Ike are the same as those contained in the 1st Amended Declaration of Emergency and Administrative Order for Hurricane Gustav, signed September 6, 2008.

Index of Variances/Waivers ~ Hurricane Ike

Facility/Site Variance Requested For OR Waiver Issued by Environ. Department/Agency	Nature of Variance (Request)	Date of Request	Response	Response Date
La Pigment-Westlake	Extension of variance granted for Hurricane Gustav for non-routine operating conditions in anticipation of Hurricane Ike.	9/11/2008	Request Approved	09/12/08
Little Gypsy Unit 2	Variance request is needed as Hurricane Gustav and Ike have limited the natural gas supply from suppliers as the gas producing platforms in the Gulf of Mexico have shut down. Request variance in accordance with LAC 33:III.917 to allow an exception to specific requirements 57 and 77 or Title V permit 2520-00009-VI reference LAC 33:III.1101. and require opacity to be less than 20 %...	9/11/2008	Request Approved	09/12/08



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

THE ADMINISTRATOR

The Honorable Bobby Jindal
Governor
State of Louisiana
P.O. Box 94004
Baton Rouge, Louisiana 70804

AUG 29 2008

Re: August 2008 Fuel Waiver Concerning Louisiana

Dear Governor Jindal:

This is in response to the August 29, 2008 request for a waiver under the Clean Air Act (CAA) made on your behalf by the Secretary of the Louisiana Department of Environmental Quality, Harold Leggett, PhD, to address a fuel supply emergency caused by the impending landfall of Hurricane Gustav. The letter requests that the U.S. Environmental Protection Agency waive the federal regulations requiring low volatility gasoline to be sold in the following sixteen Louisiana parishes: Ascension, Beauregard, Calcasieu, E. Baton Rouge, Iberville, Jefferson, Lafayette, Lafourche, Livingston, Orleans, Point Coupee, St. Bernard, St. Charles, St. James, St. Mary, and W. Baton Rouge (the "designated parishes"). As you know, regulations promulgated under the Clean Air Act require gasoline sold in the designated parishes to have maximum Reid Vapor Pressure (RVP) of 7.8 pounds per square inch (psi) during the "high ozone" season, through September 15, 2008. See 40 C.F.R. § 80.27. EPA has determined, and the United States Department of Energy (DOE) concurs, that it is necessary to take action to minimize or prevent disruption of Louisiana's gasoline supply in the designated parishes. By this letter, I am granting a waiver to Louisiana, as described below.

EPA, in consultation with DOE, has evaluated the gasoline supply problems in the designated parishes as a result of Hurricane Gustav, which is currently projected to be a Category 3 hurricane at the time it makes landfall on the Gulf Coast. On August 27, a state-wide state of emergency was declared for Louisiana, and as of today partial evacuations in several of the designated parishes have already begun. In addition, preparations are currently being made for a potentially broader mandatory evacuation order, and National Guard soldiers have been ordered to New Orleans. The supply of 7.8 psi RVP in the designated parishes is already constrained and the evacuation-related activities currently underway in Louisiana have further caused a rapid and unexpected increase in demand for gasoline. EPA's and DOE's evaluation indicates that at the current rate of consumption there is not a sufficient supply of 7.8 psi RVP gasoline available for the designated parishes to ensure that retail outlets in these areas can maintain an adequate supply

Internet Address (URL) • <http://www.epa.gov>

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of compliant gasoline to facilitate a safe and orderly evacuation. Based on this evaluation, and due to the unique circumstances regarding hurricane evacuation procedures, preparation and response in Louisiana, EPA has determined, and DOE concurs, that it is necessary to take the following action to minimize or prevent disruption of gasoline supply.

I have determined that an "extreme and unusual fuel supply circumstance" exists that will prevent the distribution of an adequate supply of gasoline to consumers in the designated parishes. CAA § 211(c)(4)(C)(ii)(I), 42 U.S.C. § 7545(c)(4)(C)(ii)(I). This extreme and unusual fuel circumstance is the result of Hurricane Gustav, a natural disaster that could not reasonably have been foreseen or prevented, and is not attributable to a lack of prudent planning on the part of suppliers of the fuel to this area. CAA § 211(c)(4)(C)(ii)(II), 42 U.S.C. § 7545(c)(4)(C)(ii)(II). Furthermore, I have determined that it is in the public interest to grant this waiver and that this waiver applies to the smallest geographic area necessary to address the fuel supply circumstances. CAA § 211(c)(4)(C)(ii)(III) and (iii)(I), 42 U.S.C. § 7545(c)(4)(C)(ii)(III) and (iii)(I).

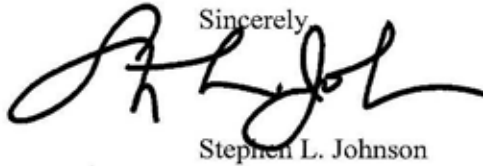
Therefore, to minimize or prevent problems with the supply of gasoline, I am today issuing this waiver of the 7.8 psi RVP requirement for the sixteen parishes in Louisiana that are subject to this standard. This waiver is effective immediately and will continue through 11:59 p.m. on September 8, 2008. Under this temporary waiver, regulated parties should distribute and sell gasoline meeting the 7.8 psi RVP standard in the designated parishes where such supplies are available; however, in the event that emergency conditions preclude the sale or distribution of gasoline meeting this standard, gasoline with an RVP of 9.0 psi may be distributed and sold. In addition, the requirement of 40 C.F.R. § 80.27(d) that a 1 psi increase is allowed only if the ethanol content is between 9% and 10% by volume, is waived.

After September 8, 2008, regulated parties may not introduce gasoline that does not meet the 7.8 psi RVP requirement of 40 C.F.R. § 80.27 into terminal storage tanks from which gasoline is dispensed into trucks for distribution to retail outlets in the designated parishes. However, the gasoline dispensed from such terminal tanks for distribution and sale in the designated parishes is not required to meet the 7.8 psi RVP requirement of 40 C.F.R. § 80.27 for the remainder of the "high ozone" period, through September 15. Retailers and wholesale purchaser-consumers may continue selling or dispensing gasoline not meeting the applicable RVP standard until their supplies are depleted.

We at EPA recognize the benefits of the federal 7.8 RVP requirement in the designated parishes; therefore, to the extent practicable and consistent with supplying market demands for gasoline (e.g., where tankage is available), regulated parties should take steps to segregate and supply gasoline that meets the lower RVP requirement. EPA will continue to work with DOE and affected states to monitor the impact of Hurricane Gustav on the fuel supply situation in the Gulf region. Should conditions warrant, this waiver may be modified, terminated or extended, as appropriate.

If you have questions you may call me, or your staff may call Adam M. Kushner at (202) 564-2260.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. L. Johnson', with a stylized flourish at the end.

Stephen L. Johnson

cc: The Honorable Samuel W. Bodman
Secretary of Energy

ATTACHMENT B

DEBRIS MANAGEMENT REPORT

DOTD DEBRIS SITES BY PARISH

Parish Entity	Staging, Chipping & Grinding	Disposal Site	Grinding Site Only	Chipping & Burning Site	Chipping, Grinding, Staging & Burning	Chipping & Grinding	Burning Only	Grinding & Burning	Staging & Burning	Staging, Chipping & Burning	Chipping Site Only	Total
Acadia Parish Police Jury												0
Allen Parish Police Jury												0
Ascension Parish Council			1			1						2
Assumption Parish Police Jury							1					1
Avoyelles Parish Police Jury						3						3
Beauregard Parish Police Jury												0
Bienville Parish Police Jury												0
Bossier Parish Police Jury												0
Caddo Parish Commission												0
Calcasieu Parish Police Jury												0
Caldwell Parish Police Jury												0
Cameron Parish Police Jury												0
Catahoula Parish Police Jury												0
Claiborne Parish Police Jury												0
Concordia Parish Police Jury												0
DeSoto Parish Police Jury												0
East Baton Rouge Parish Metro Council			2				1					3
East Carroll Parish Police Jury												0
East Feliciana Parish Police Jury							4					4
Evangeline Parish Police Jury							3					3

DOTD DEBRIS SITES BY PARISH

Parish Entity	Staging, Chipping & Grinding	Disposal Site	Grinding Site Only	Chipping & Burning Site	Chipping, Grinding, Staging & Burning	Chipping & Grinding	Burning Only	Grinding & Burning	Staging & Burning	Staging, Chipping & Burning	Chipping Site Only	Total
Franklin Parish Police Jury												0
Grant Parish Police Jury						1						1
Iberia Parish Council							1					1
Iberville Parish Council							1					1
Jackson Parish Police Jury												0
Jefferson Davis Parish Police Jury												0
Jefferson Parish Council							2					2
Lafayette Consolidated Government							1					1
Lafourche Parish Council							4					4
Lasalle Parish Police Jury												0
Lincoln Parish Police Jury												0
Livingston Parish Council							1					1
Madison Parish Police Jury												0
Morehouse Parish Police Jury												0
Natchitoches Parish Police Jury						1						1
Orleans Parish Council			1									1
Ouachita Parish Police Jury												0
Plaquemines Parish Council								3				3
Pointe Coupee Parish Police Jury								1				1
Rapides Parish Police Jury							3					3

DOTD DEBRIS SITES BY PARISH

Parish Entity	Staging, Chipping & Grinding	Disposal Site	Grinding Site Only	Chipping & Burning Site	Chipping, Grinding, Staging & Burning	Chipping & Grinding	Burning Only	Grinding & Burning	Staging & Burning	Staging, Chipping & Burning	Chipping Site Only	Total
Red River Parish Police Jury												0
Richland Parish Police Jury												0
Sabine Parish Police Jury												0
St. Bernard Parish Council							1					1
St. Charles Parish Council												0
St. Helena Parish Police Jury							2					2
St. James Parish Council							1					1
St. John the Baptist Parish Council							3					3
St. Landry Parish Council							1					1
St. Martin Parish Council							3					3
St. Mary Parish Council							1					1
St. Tammany Parish Council			1				2					3
Tangipahoa Parish Council							1				2	3
Tensas Parish Police Jury												0
Terrebonne Parish Council							1					1
Union Parish Police Jury												0
Vernon Parish Police Jury												0
Washington Parish Council							2					2
Webster Parish Police Jury												0

DOTD DEBRIS SITES BY PARISH

Parish Entity	Staging, Chipping & Grinding	Disposal Site	Grinding Site Only	Chipping & Burning Site	Chipping, Grinding, Staging & Burning	Chipping & Grinding	Burning Only	Grinding & Burning	Staging & Burning	Staging, Chipping & Burning	Chipping Site Only	Total
West Carroll Parish Police Jury												0
West Feliciana Parish Police Jury							1					1
Winn Parish Police Jury												0
Totals	0	0	5	0	0	6	41	4	0	0	2	58

DEBRIS SITES BY PARISH

Parish Entity	Staging Only	Staging, Chipping & Grinding	Disposal Site	Grinding Site Only	Chipping & Burning Site	Chipping, Grinding, Staging & Burning	Chipping & Grinding	Burning Only	Chipping, Grinding & Burning	Staging & Burning	Staging, Chipping & Burning	Staging, Grinding & Burning	Chipping Only Site	Total
Acadia Parish Police Jury			1				1							2
Allen Parish Police Jury			1					5						6
Ascension Parish Council		2	1											3
Assumption Parish Police Jury	1													1
Avoyelles Parish Police Jury								4	1					5
Beauregard Parish Police Jury														0
Bienville Parish Police Jury														0
Bossier Parish Police Jury														0
Caddo Parish Commission			4											4
Calcasieu Parish Police Jury			5											5
Caldwell Parish Police Jury														0
Cameron Parish Police Jury														0
Catahoula Parish Police Jury			1					2						3
Claiborne Parish Police Jury										1				1
Concordia Parish Police Jury								1						1
DeSoto Parish Police Jury			1											1
East Baton Rouge Parish Metro Council	3		2											5
East Carroll Parish Police Jury														0

DEBRIS SITES BY PARISH

Parish Entity	Staging Only	Staging, Chipping & Grinding	Disposal Site	Grinding Site Only	Chipping & Burning Site	Chipping, Grinding, Staging & Burning	Chipping & Grinding	Burning Only	Chipping, Grinding & Burning	Staging & Burning	Staging, Chipping & Burning	Staging, Grinding & Burning	Chipping Only Site	Total
East Feliciana Parish Police Jury										2				2
Evangeline Parish Police Jury														0
Franklin Parish Police Jury							1			2				3
Grant Parish Police Jury												1		1
Iberia Parish Council		1	2			2			1					6
Iberville Parish Council														0
Jackson Parish Police Jury			1				1							2
Jefferson Davis Parish Police Jury			1		1	1		1						4
Jefferson Parish Council	2		3				2							7
Lafayette Consolidated Government			2					4						6
Lafourche Parish Council										1				1
Lasalle Parish Police Jury			1											1
Lincoln Parish Police Jury			1											1
Livingston Parish Council			1											1
Madison Parish Police Jury														0
Morehouse Parish Police Jury								1						1
Natchitoches Parish Police Jury			1											1
Orleans Parish Council			1											1
Ouachita Parish Police Jury			2											2

DEBRIS SITES BY PARISH

Parish Entity	Staging Only	Staging, Chipping & Grinding	Disposal Site	Grinding Site Only	Chipping & Burning Site	Chipping, Grinding, Staging & Burning	Chipping & Grinding	Burning Only	Chipping, Grinding & Burning	Staging & Burning	Staging, Chipping & Burning	Staging, Grinding & Burning	Chipping Only Site	Total
Plaquemines Parish Council			2											2
Pointe Coupee Parish Police Jury							1		1					2
Rapides Parish Police Jury		1	1					1						3
Red River Parish Police Jury														0
Richland Parish Police Jury														0
Sabine Parish Police Jury			1											1
St. Bernard Parish Council														0
St. Charles Parish Council			1											1
St. Helena Parish Police Jury														0
St. James Parish Council	1							2						3
St. John the Baptist Parish Council														0
St. Landry Parish Council		1	1			1				5	1			9
St. Martin Parish Council			1					1		2				4
St. Mary Parish Council			1											1
St. Tammany Parish Council			1					1						2
Tangipahoa Parish Council		1	1		1									3
Tensas Parish Police Jury			1											1
Terrebonne Parish Council														0
Union Parish Police Jury			1											1

DEBRIS SITES BY PARISH

Parish Entity	Staging Only	Staging, Chipping & Grinding	Disposal Site	Grinding Site Only	Chipping & Burning Site	Chipping, Grinding, Staging & Burning	Chipping & Grinding	Burning Only	Chipping, Grinding & Burning	Staging & Burning	Staging, Chipping & Burning	Staging, Grinding & Burning	Chipping Only Site	Total
Vermilion Parish Police Jury			3							1				4
Vernon Parish Police Jury			3											3
Washington Parish Council			1											1
Webster Parish Police Jury			1											1
West Baton Rouge Parish Council								1						1
West Carroll Parish Police Jury			2											2
West Feliciana Parish Police Jury														0
Winn Parish Police Jury														0
TOTALS	7	6	54	0	2	4	6	24	3	14	1	1	0	122

LDEQ Debris Sites as of 09/12/2008

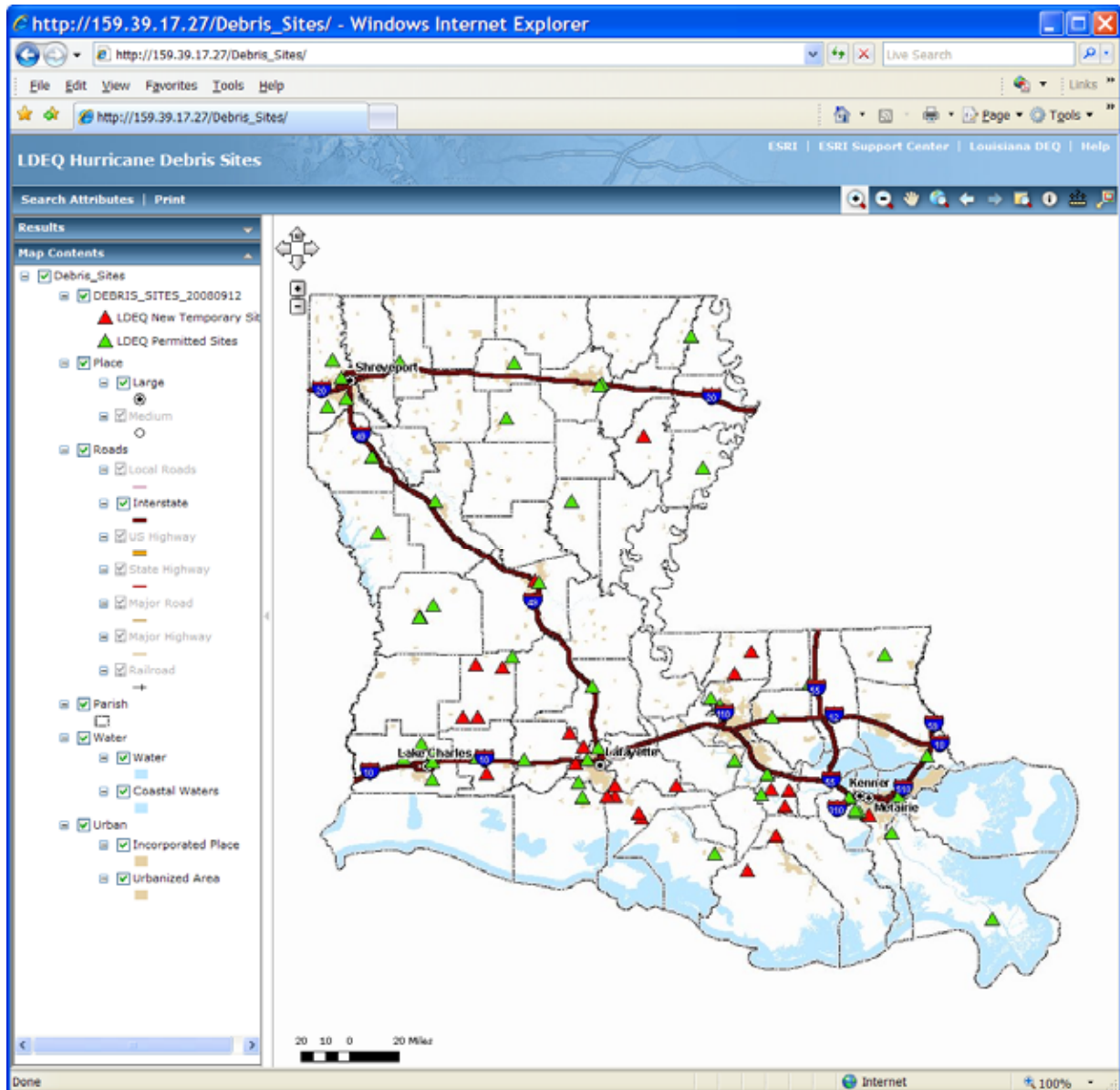
Resulting From Hurricanes Gustav and Ike

As of 9/12/2008 there are 185 debris sites created within the state of Louisiana as a result of the storm activities of Hurricanes Gustav and Ike. Of these sites there are 55 LDEQ permitted sites and 66 LDEQ new temporary debris sites, yielding total of 121 LDEQ debris sites. The remaining 64 sites of the 185 current debris sites are LDOTD sites. Of the 121 LDEQ debris sites 75 have coordinate values that can be mapped and are displayed on the LDEQ interactive website → http://159.39.17.27/Debris_Sites/. LDEQ GIS staff built a new server and installed ESRI's ArcGIS Server application in order to display the Hurricane Gustav and Ike debris site points.

ArcGIS Server is a web mapping application similar to Google Earth that allows us to publish dynamic maps with the public. With this tool, the public can identify debris sites on maps which include local roads and points of interest. It includes an Identify tool which displays detailed information about the sites, such as address, operator, phone numbers, etc. There is also a print tool so users can make hardcopy maps for later reference.

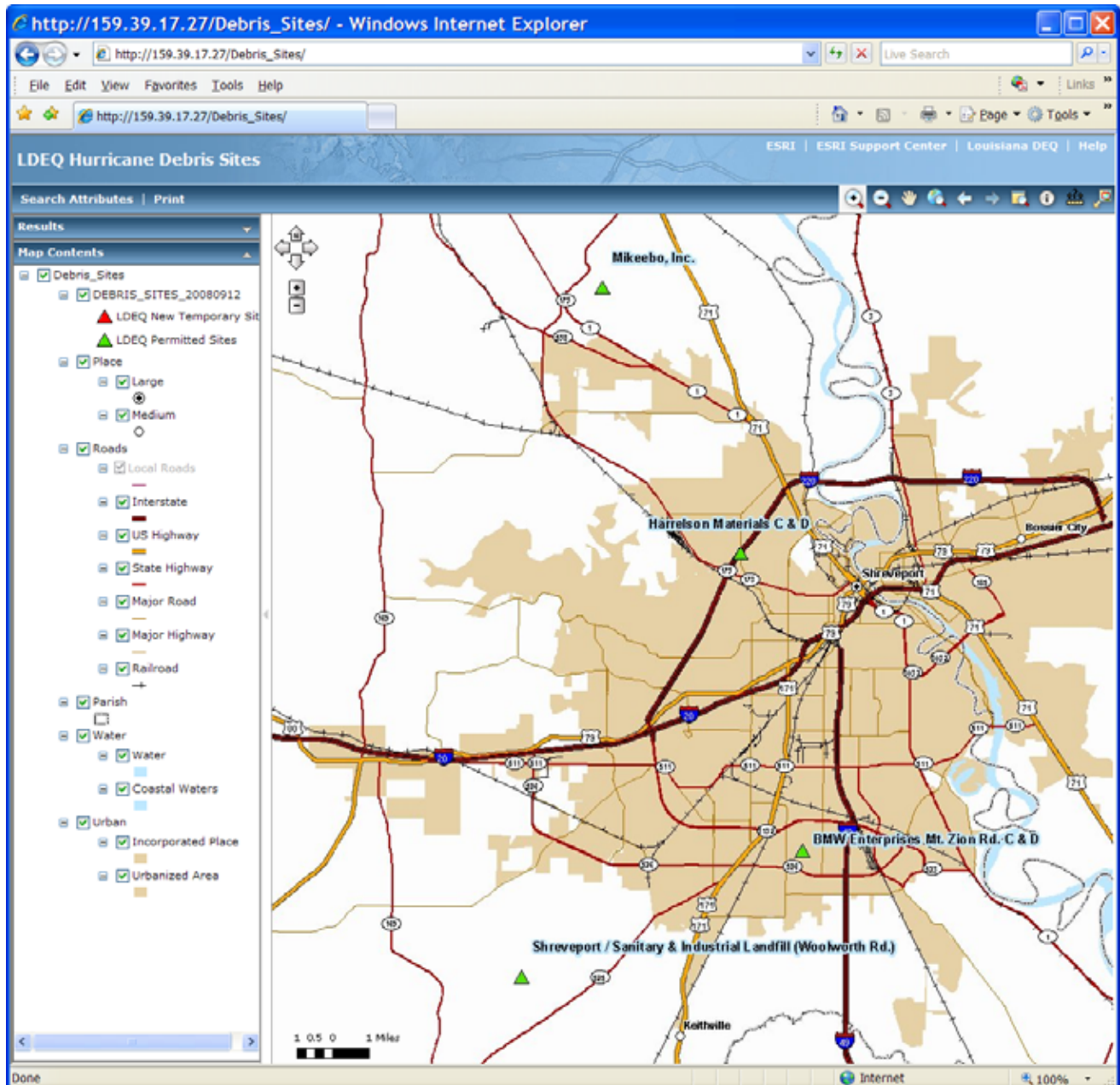
Again, the URL for this map is: http://159.39.17.27/Debris_Sites/. Currently there is an on going effort to obtain coordinate values for all LDEQ debris sites. What follows is a series of snapshots from this website, first displaying all the LDEQ sites that were able to be mapped state-wide, followed by a series of snapshots that display the parishes that currently have debris sites that can be mapped.

Mapped LDEQ Debris Sites within Louisiana



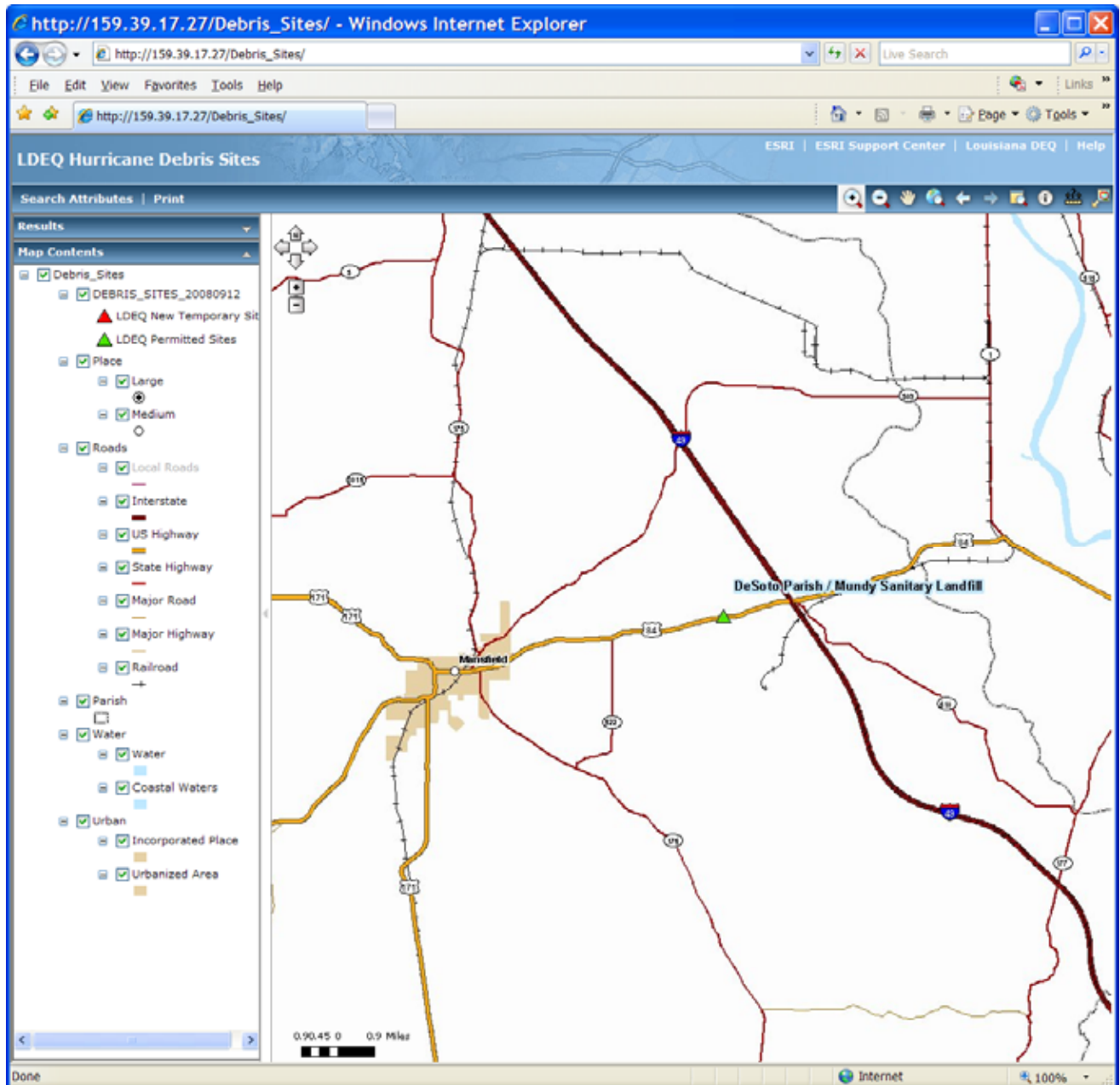
Mapped LDEQ Debris Sites

Caddo Parish



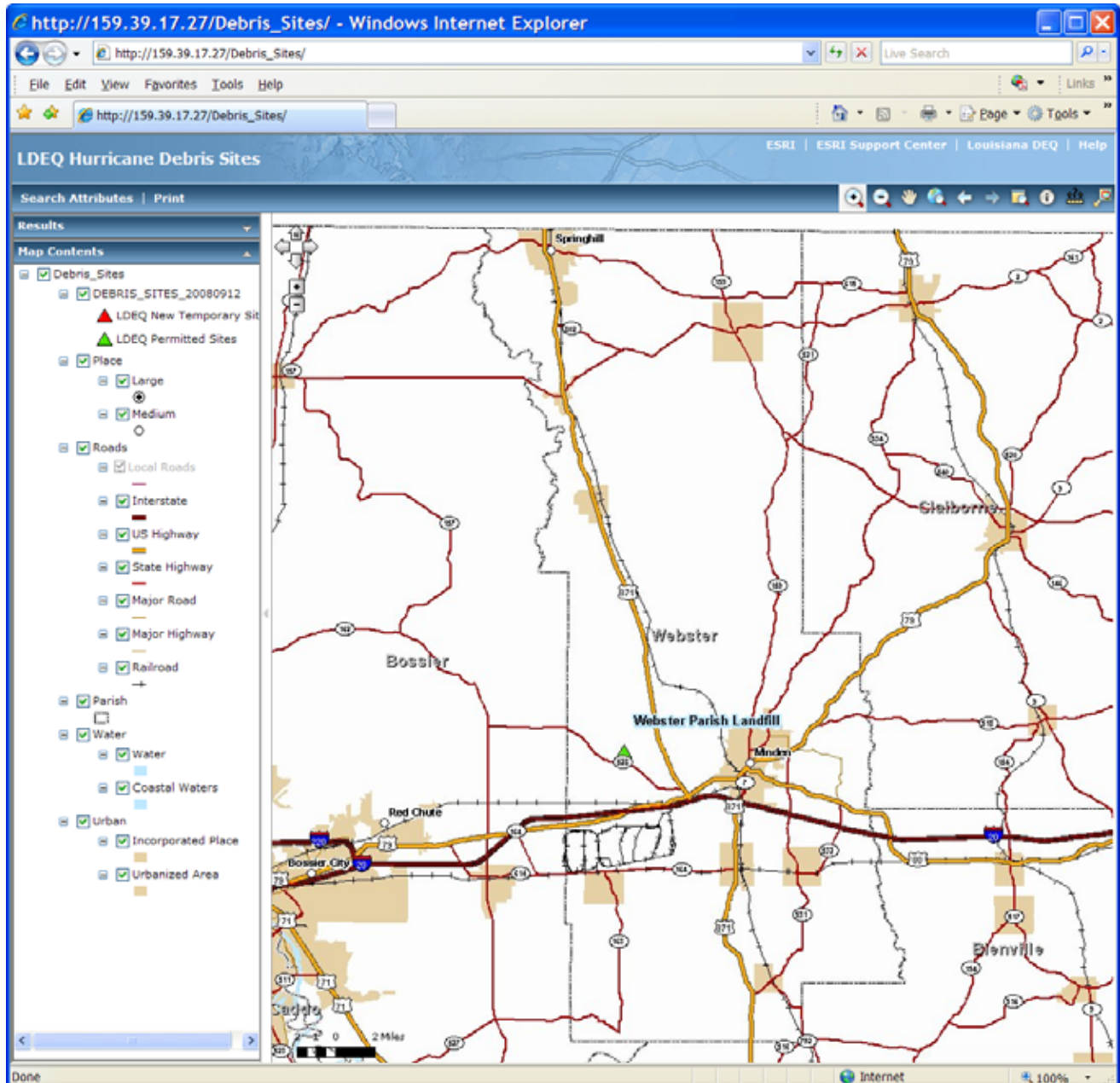
Mapped LDEQ Debris Sites

De Soto Parish



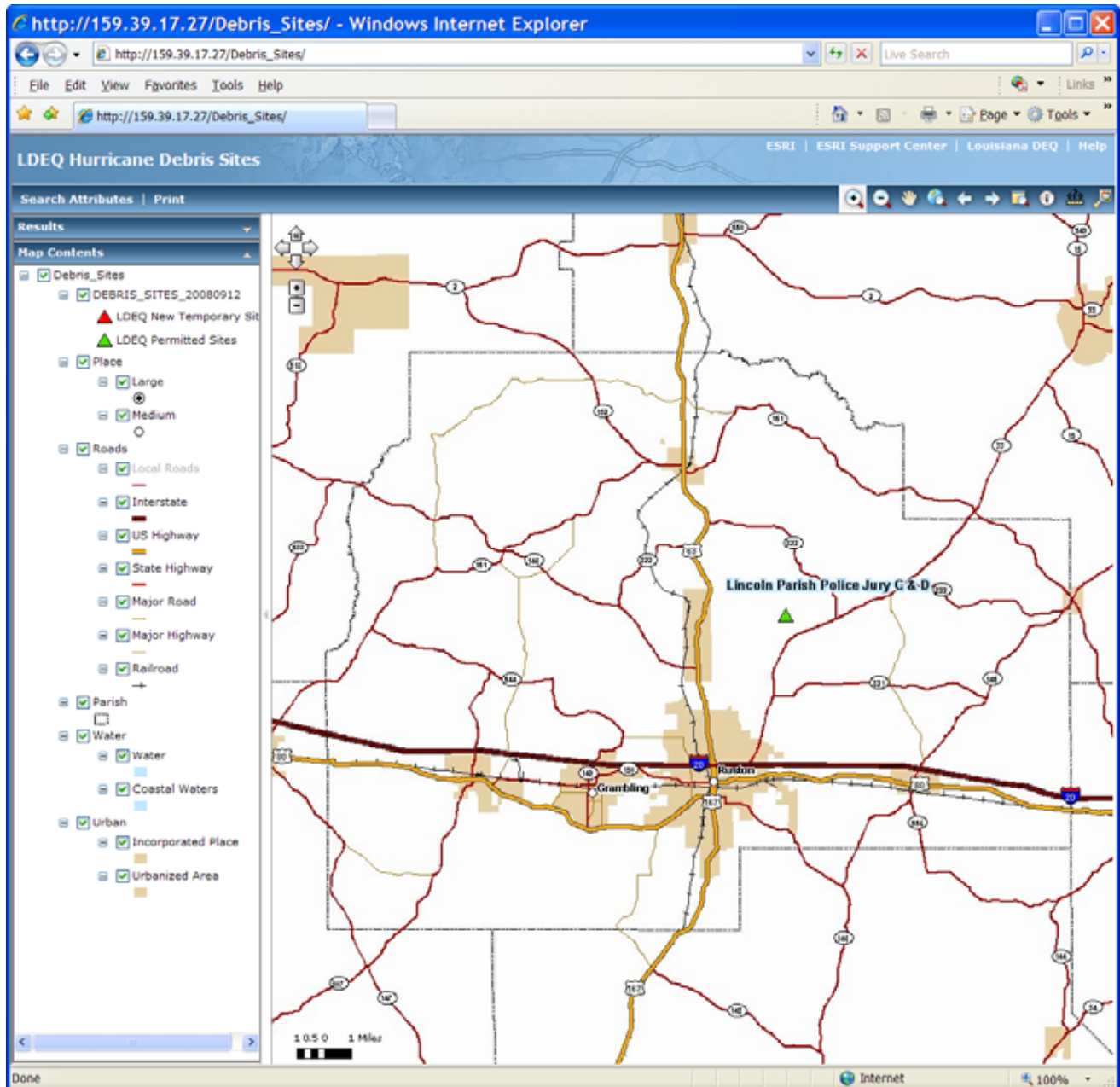
Mapped LDEQ Debris Sites

Webster Parish



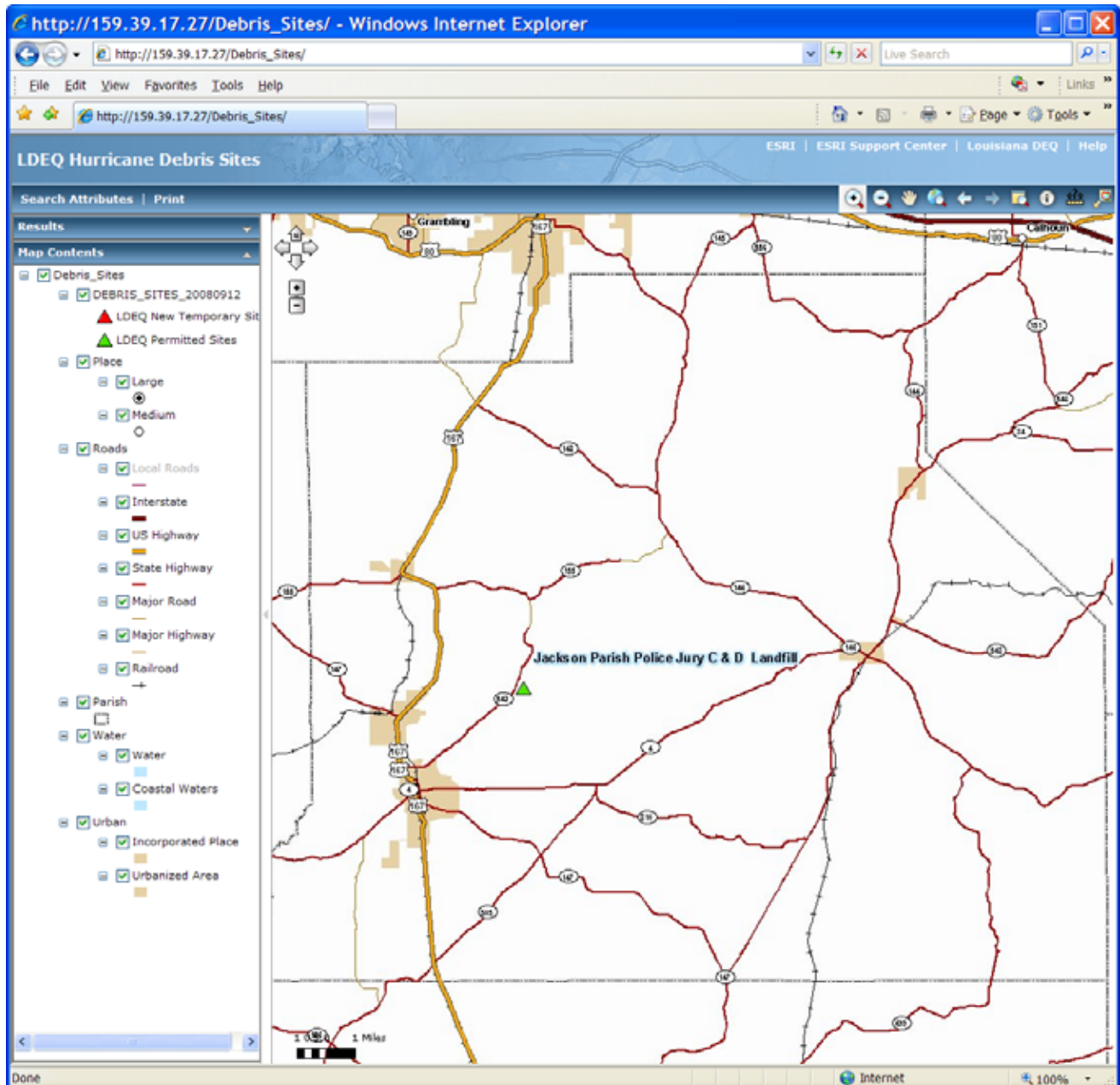
Mapped LDEQ Debris Sites

Lincoln Parish



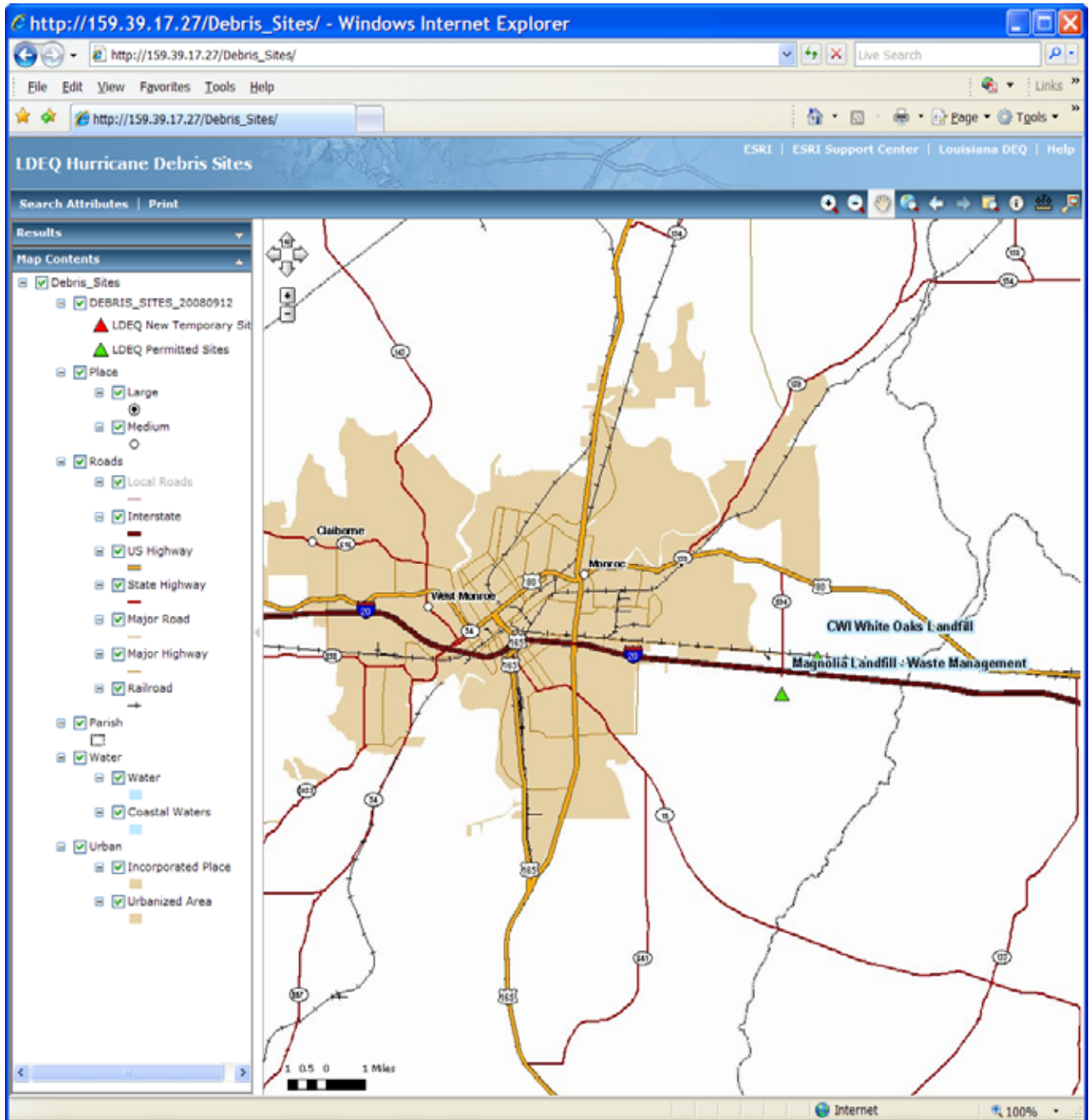
Mapped LDEQ Debris Sites

Jackson Parish



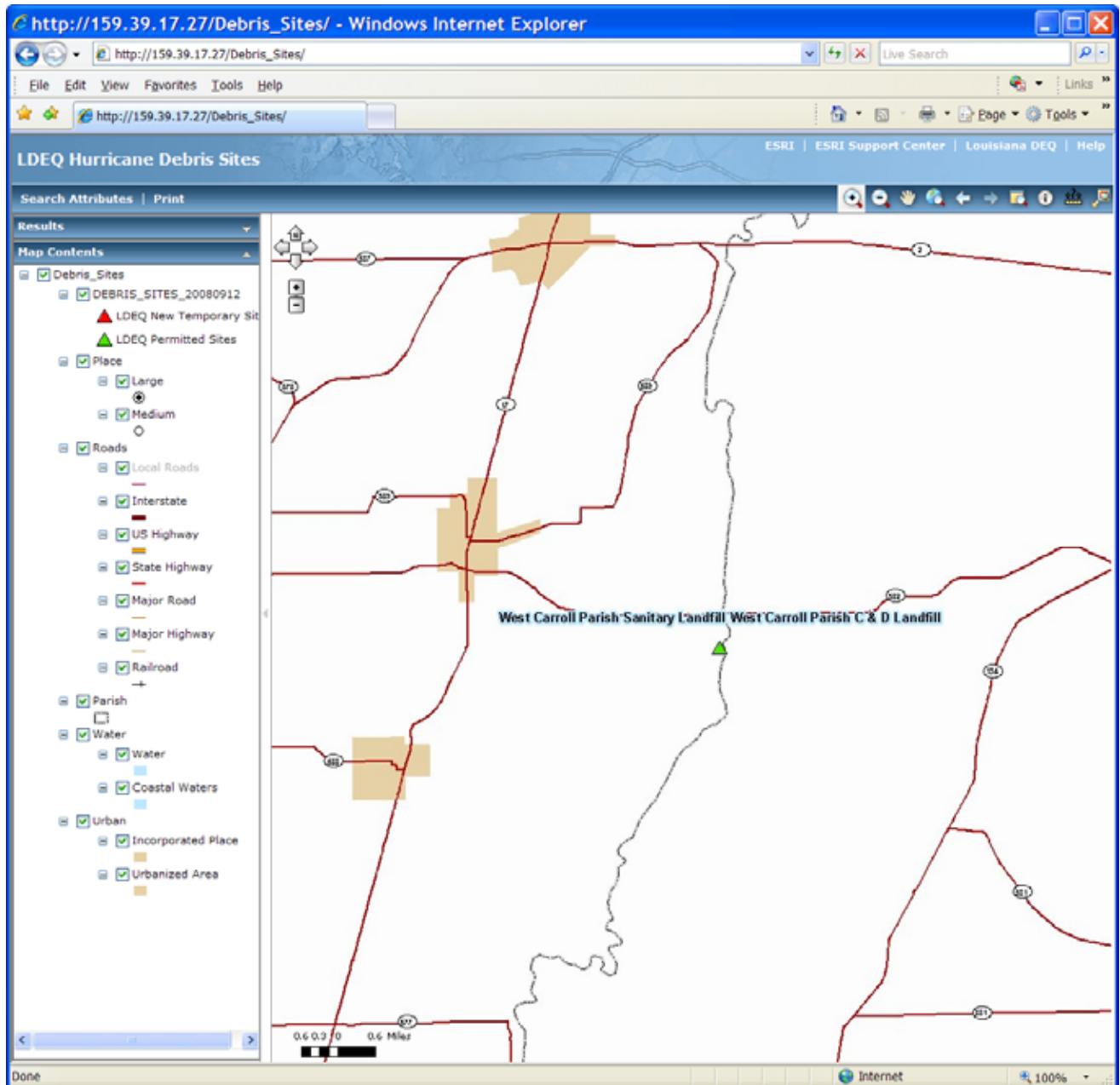
Mapped LDEQ Debris Sites

Ouachita Parish



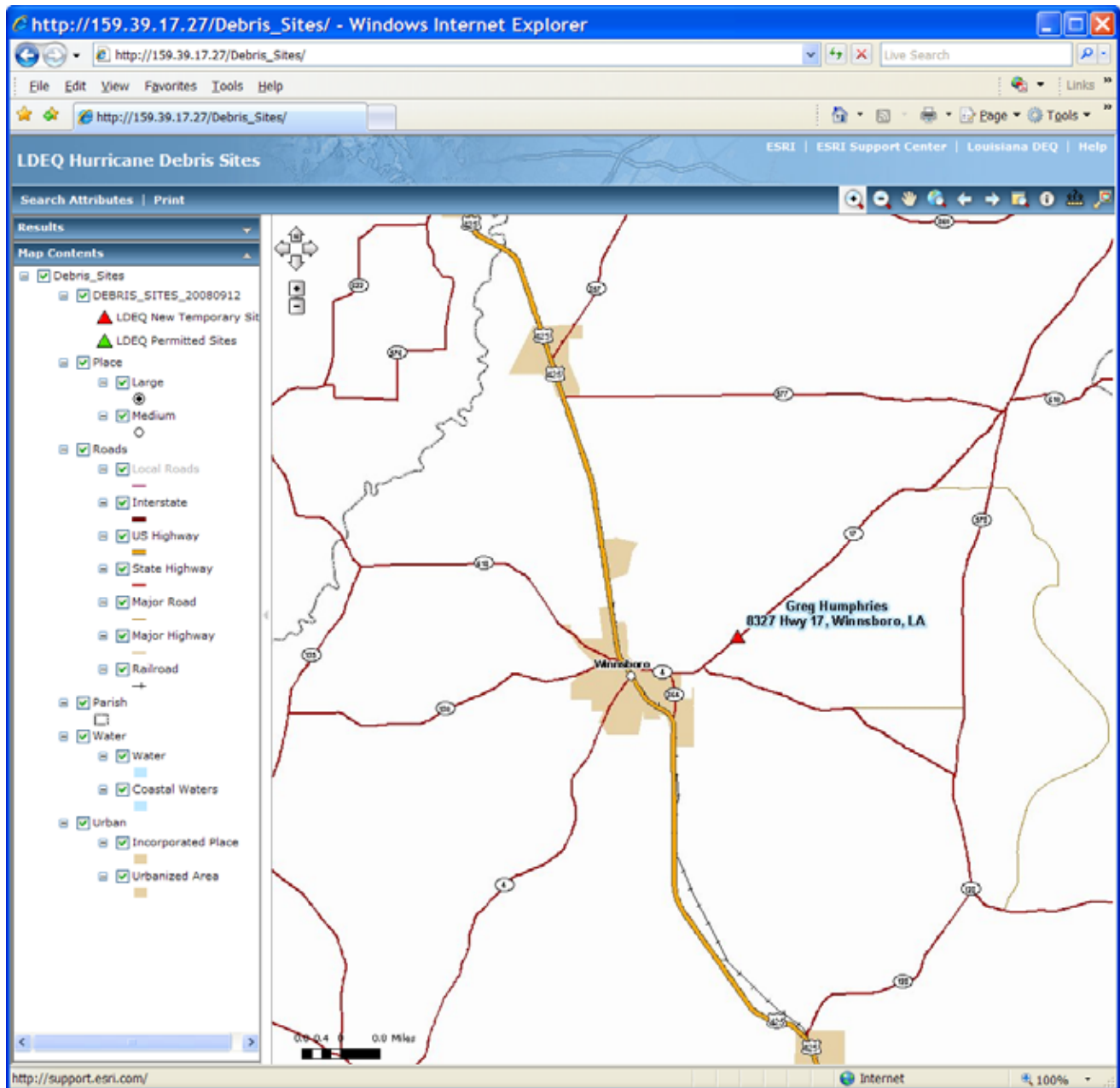
Mapped LDEQ Debris Sites

West Carroll Parish



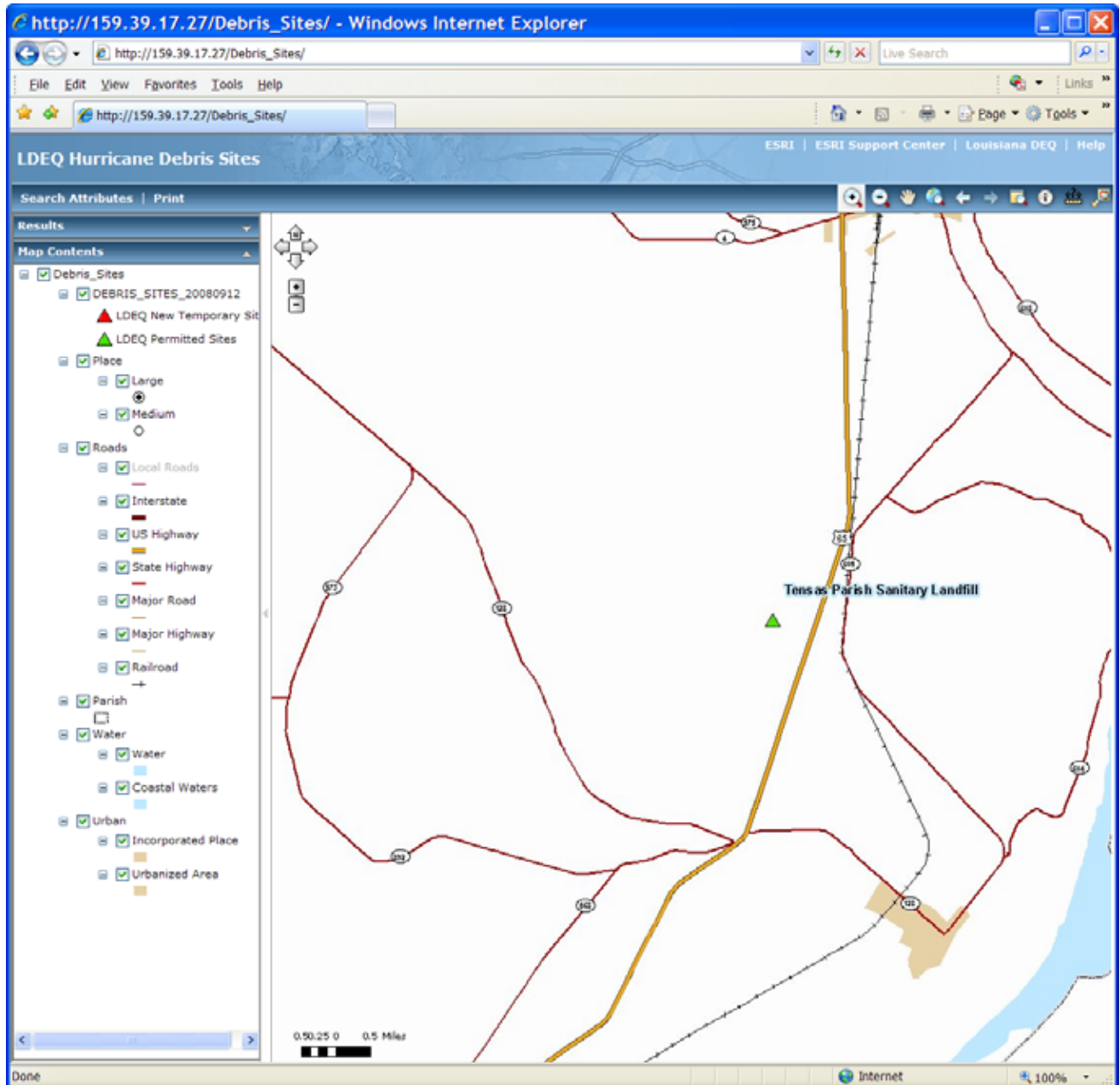
Mapped LDEQ Debris Sites

Franklin Parish



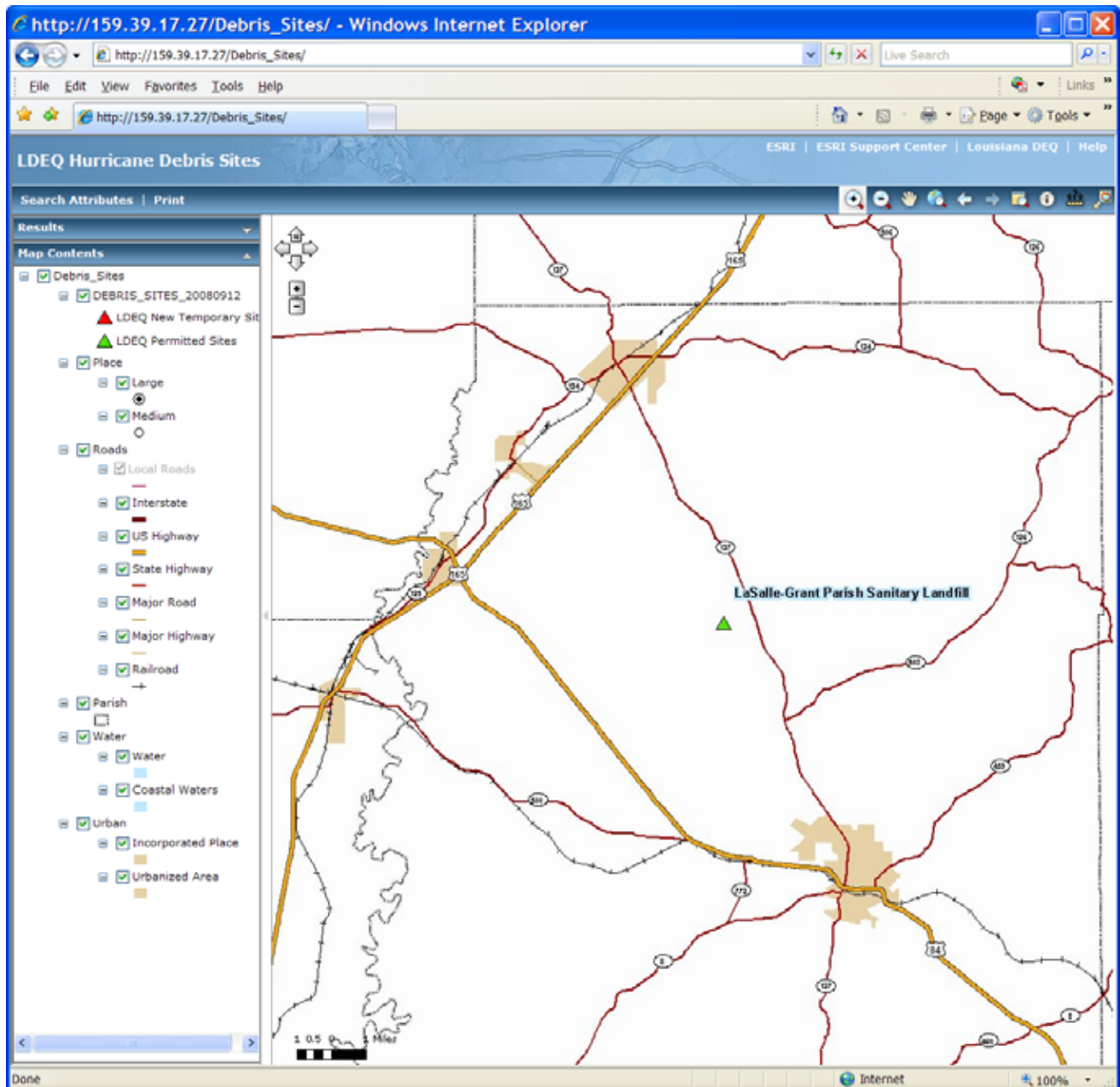
Mapped LDEQ Debris Sites

Tensas Parish



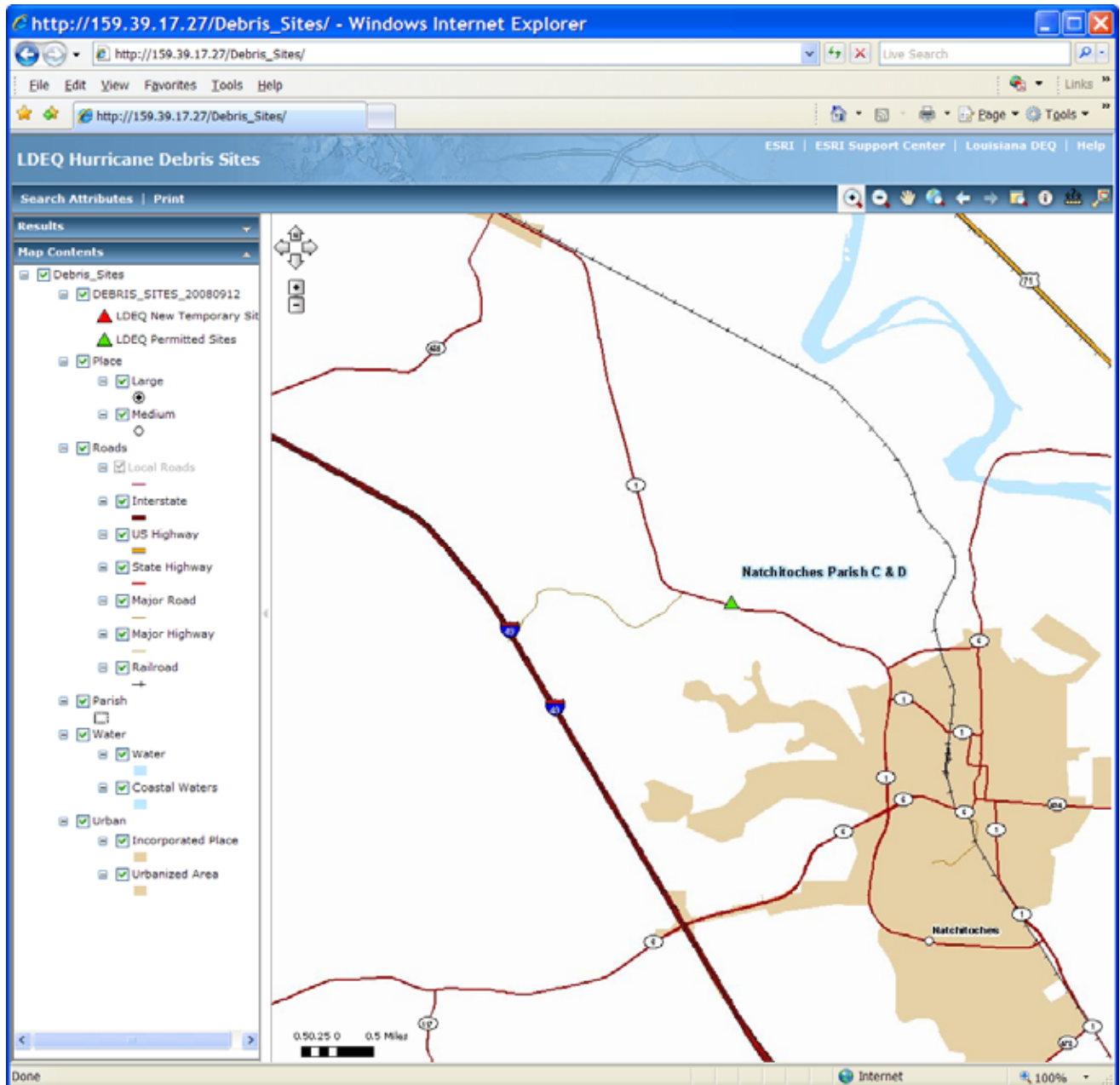
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La Salle Parish



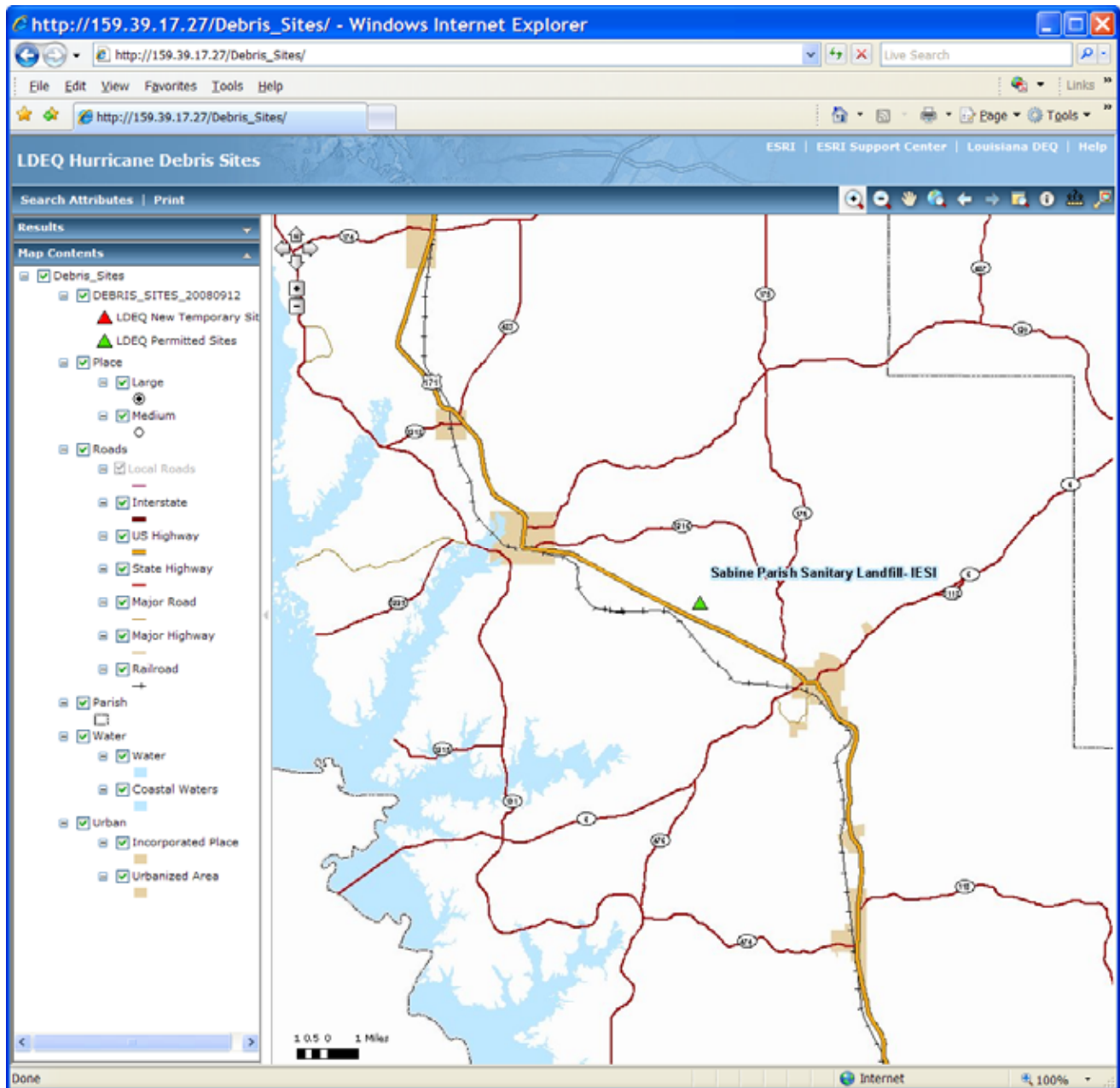
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Natchitoches Parish



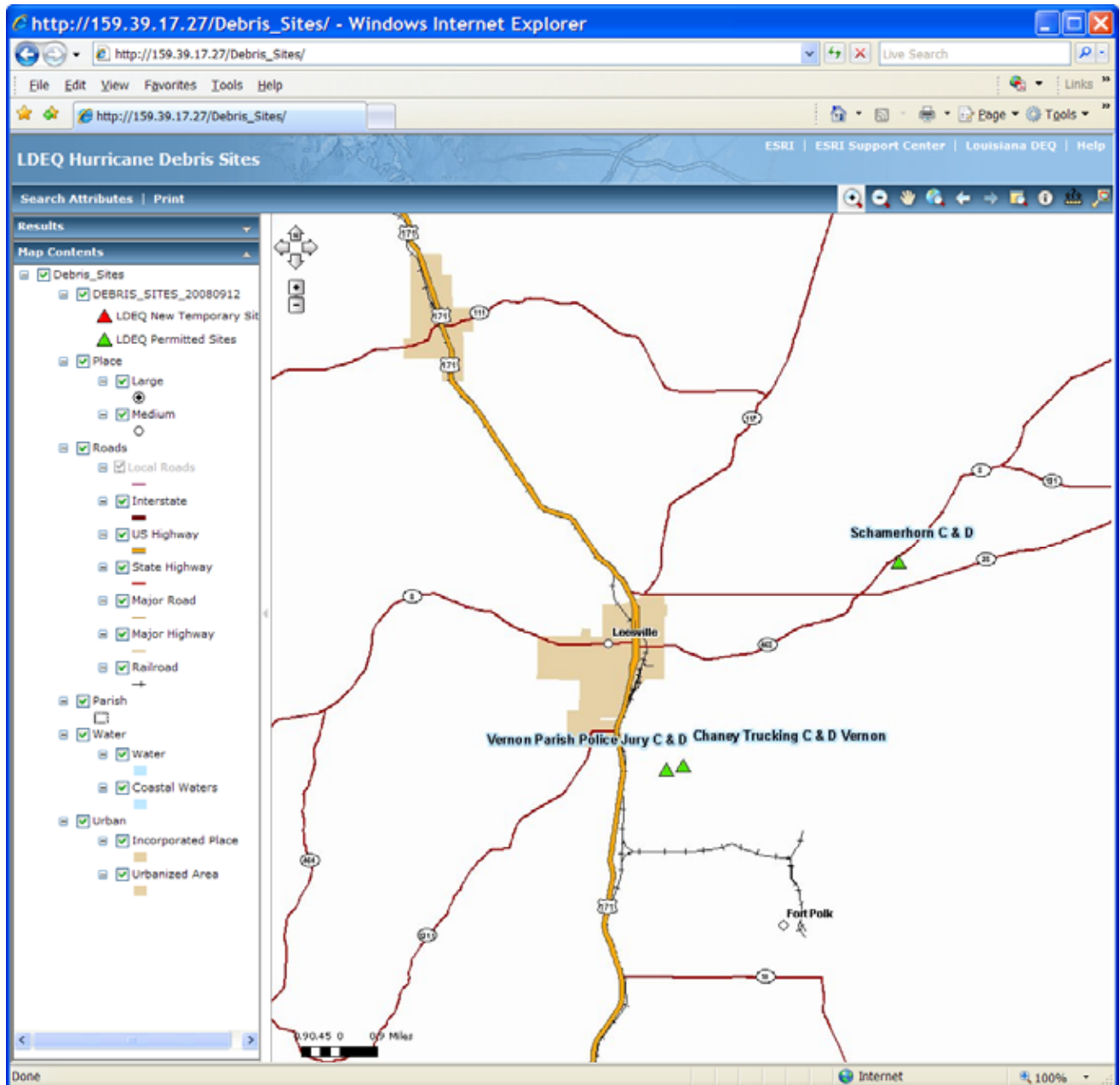
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Sabine Parish



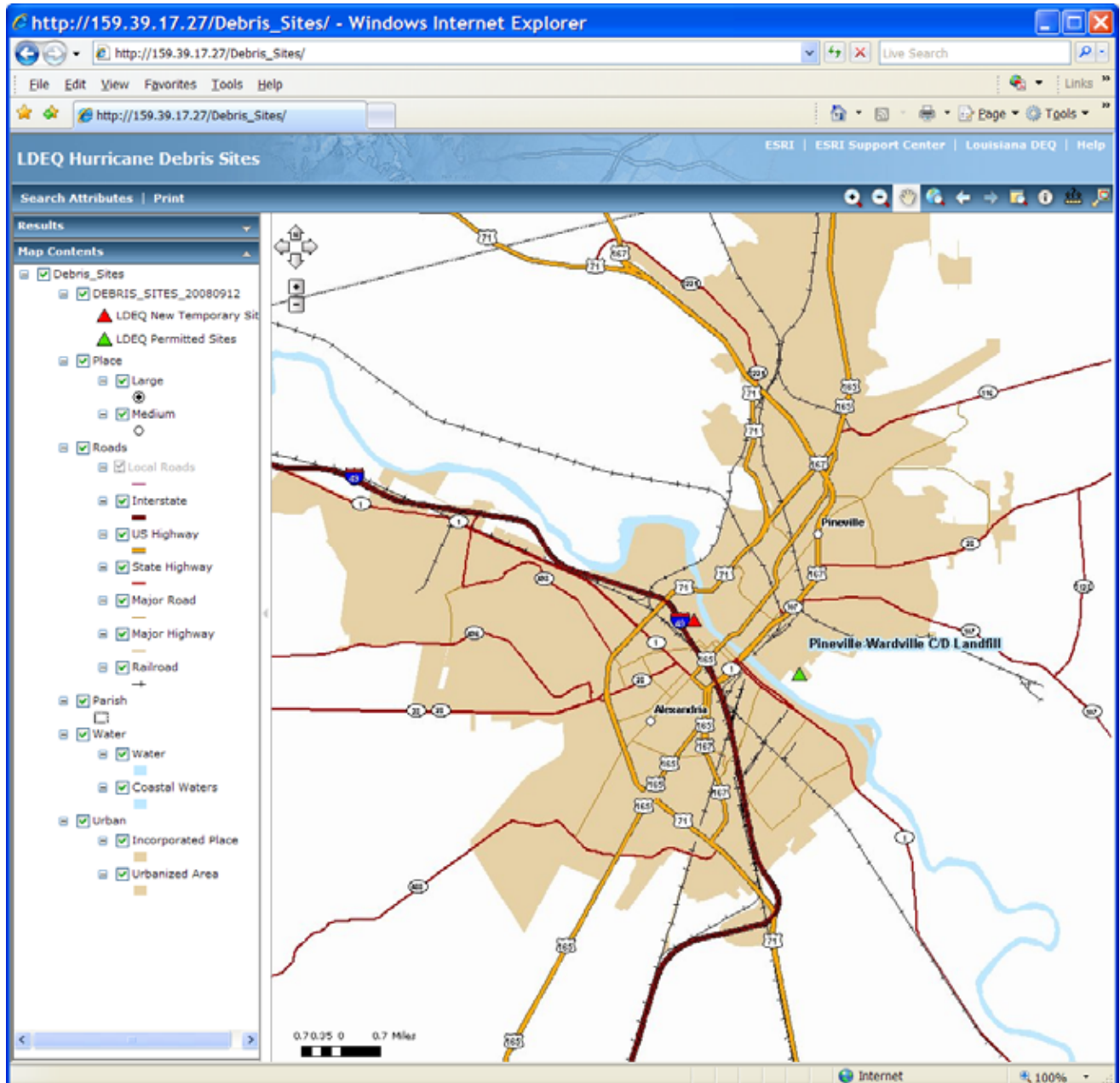
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Vernon Parish



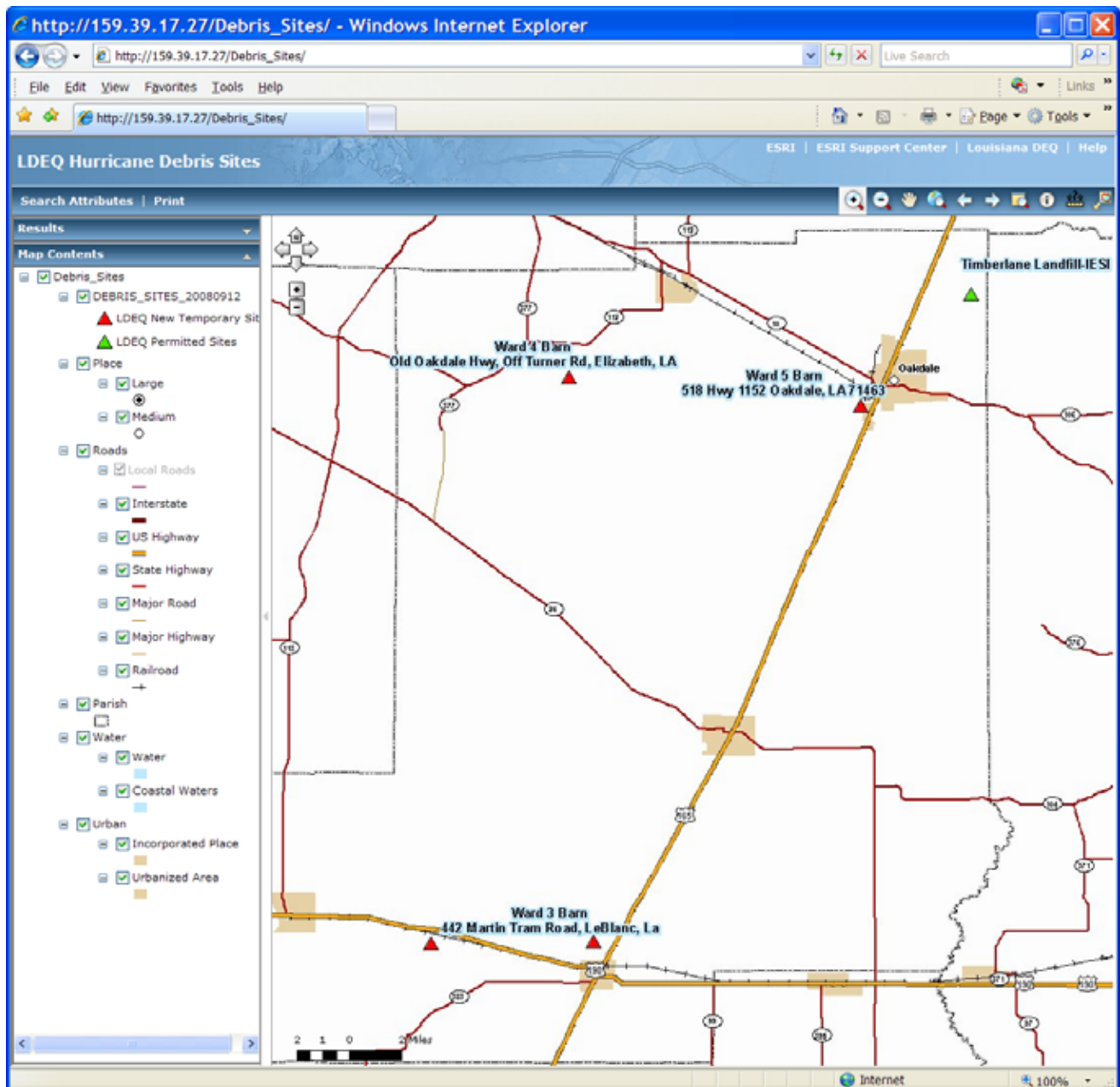
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Rapides Parish



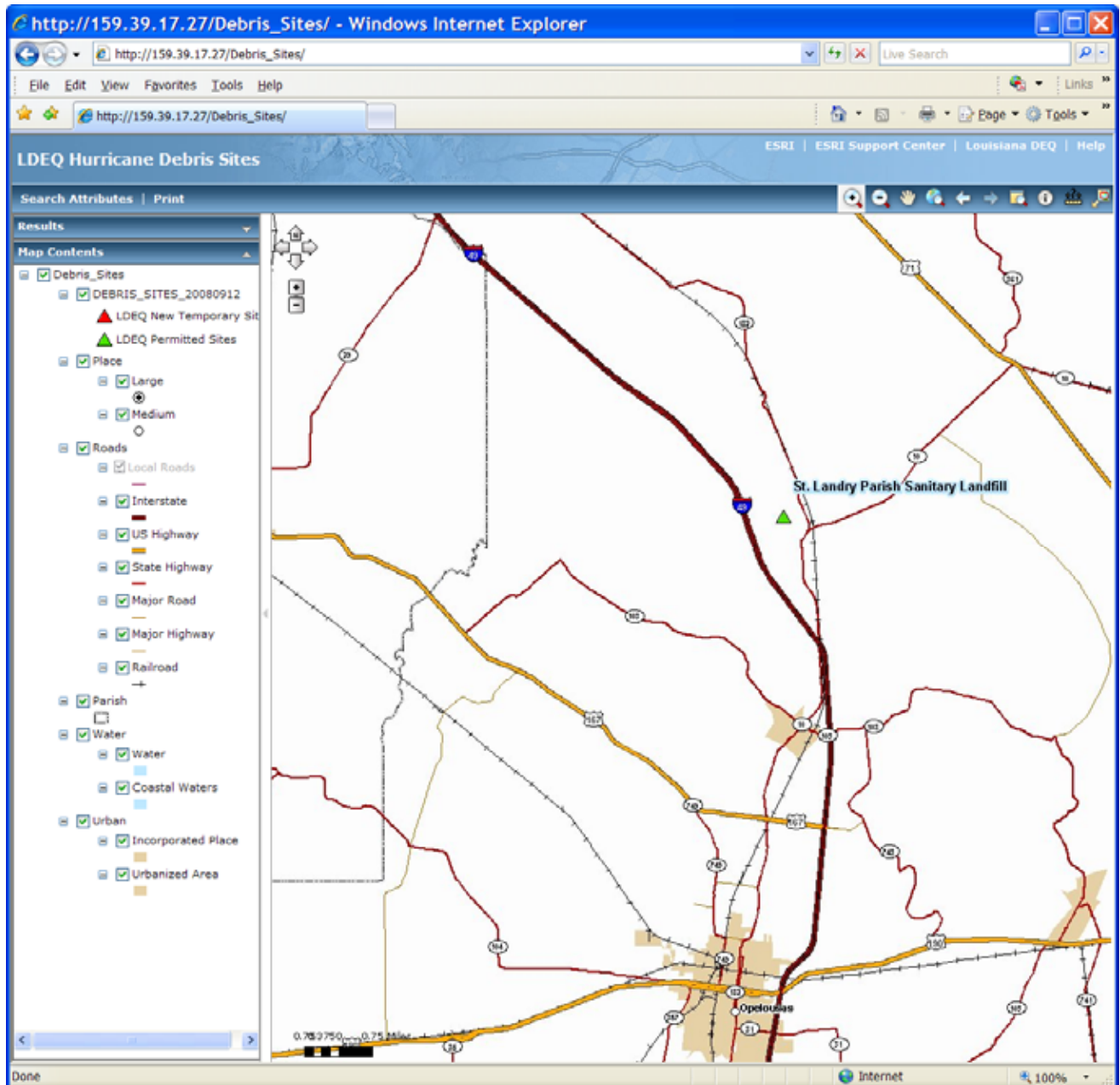
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Allen Parish



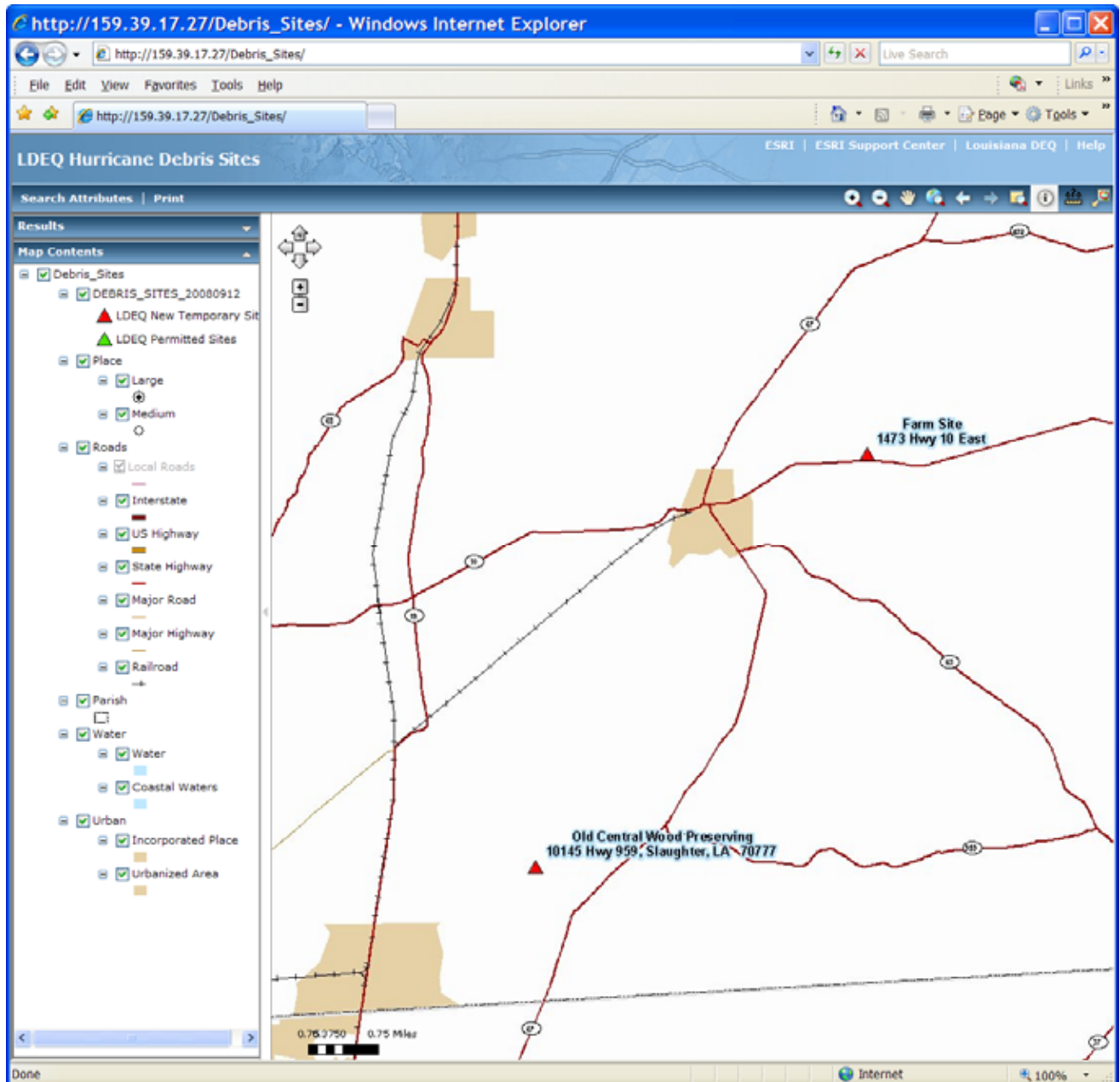
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St. Landry Parish



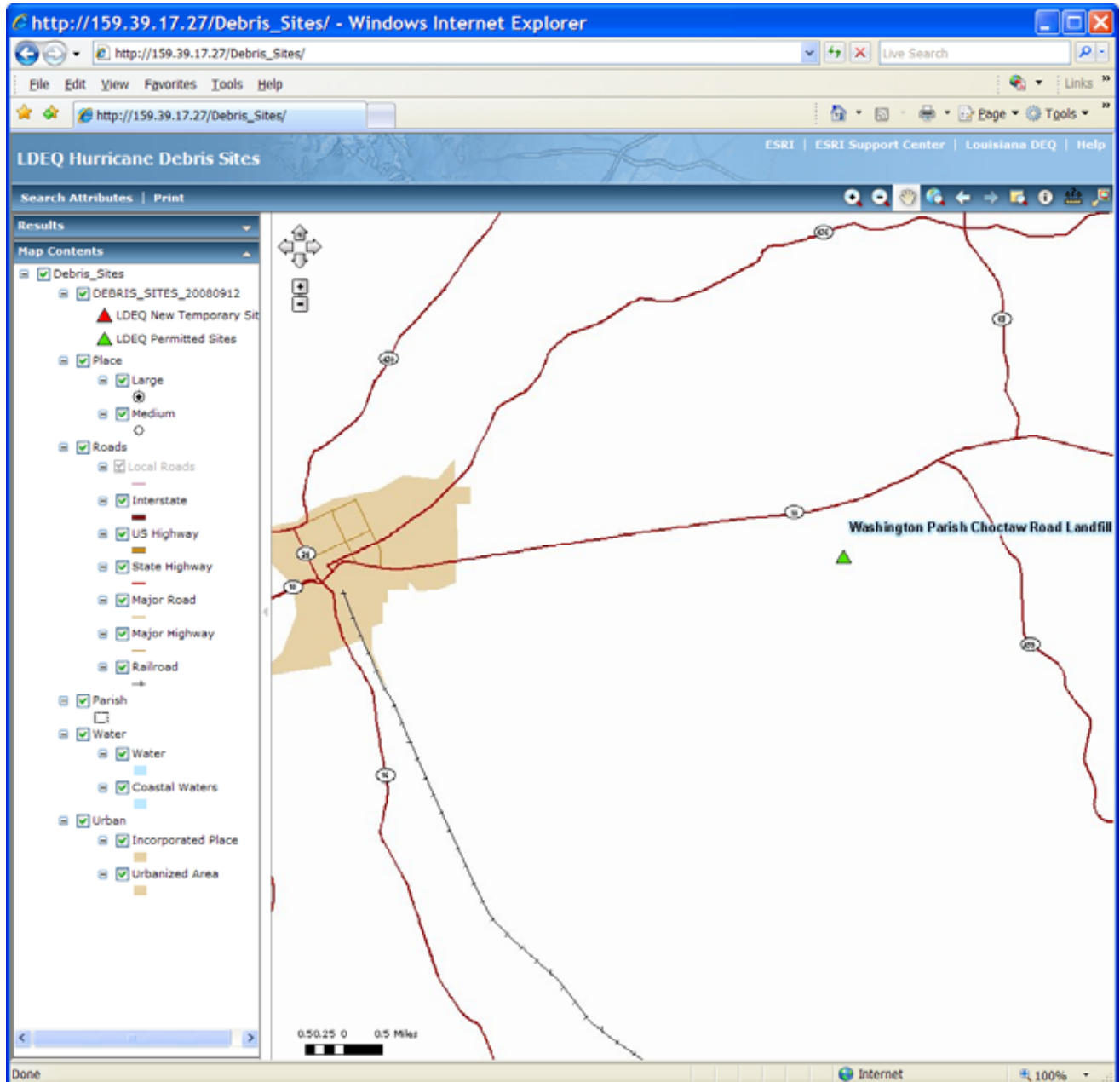
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East Feliciana Parish



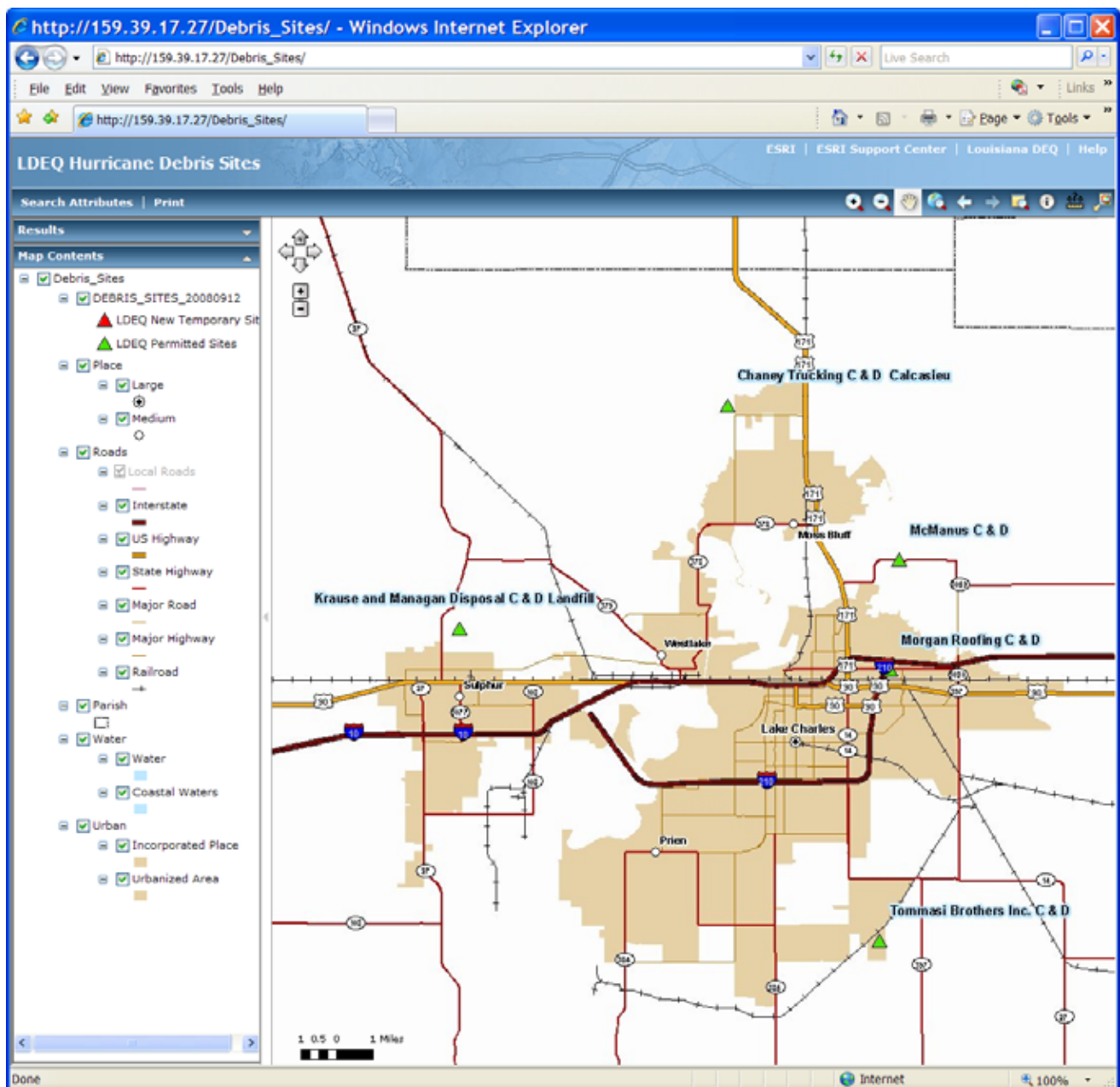
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Washington Parish



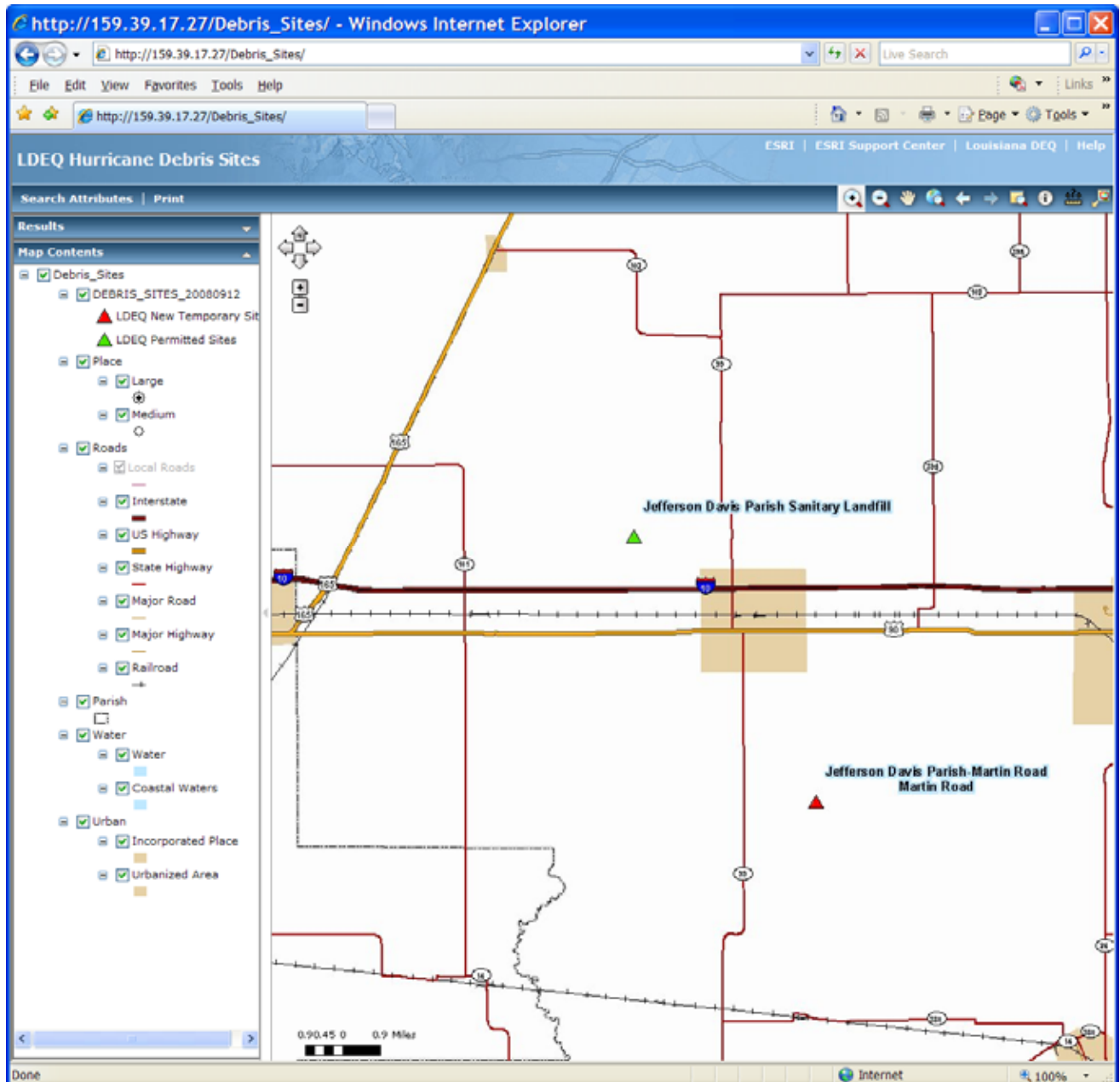
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Calcasieu Parish



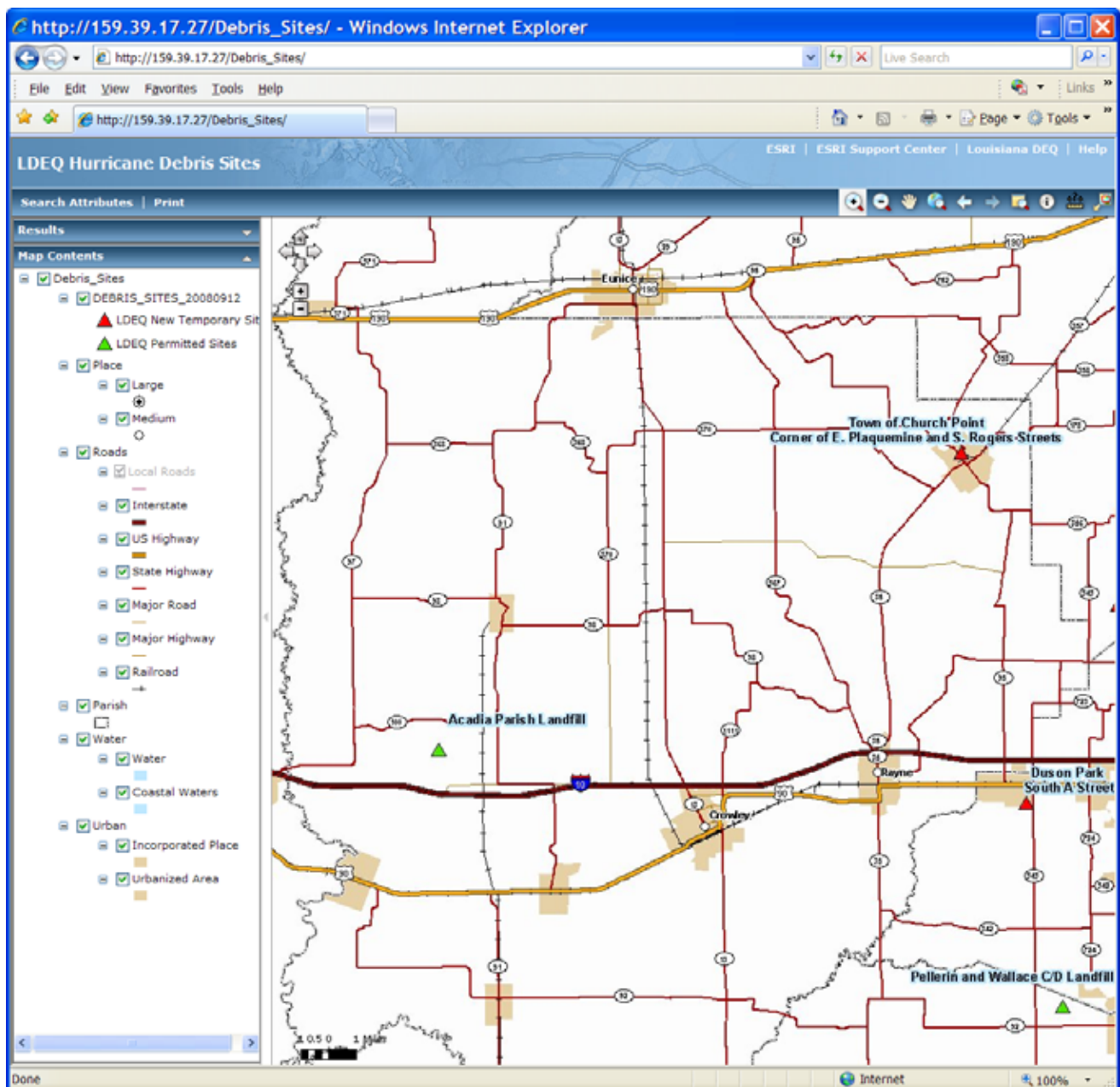
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Jefferson Davis Parish



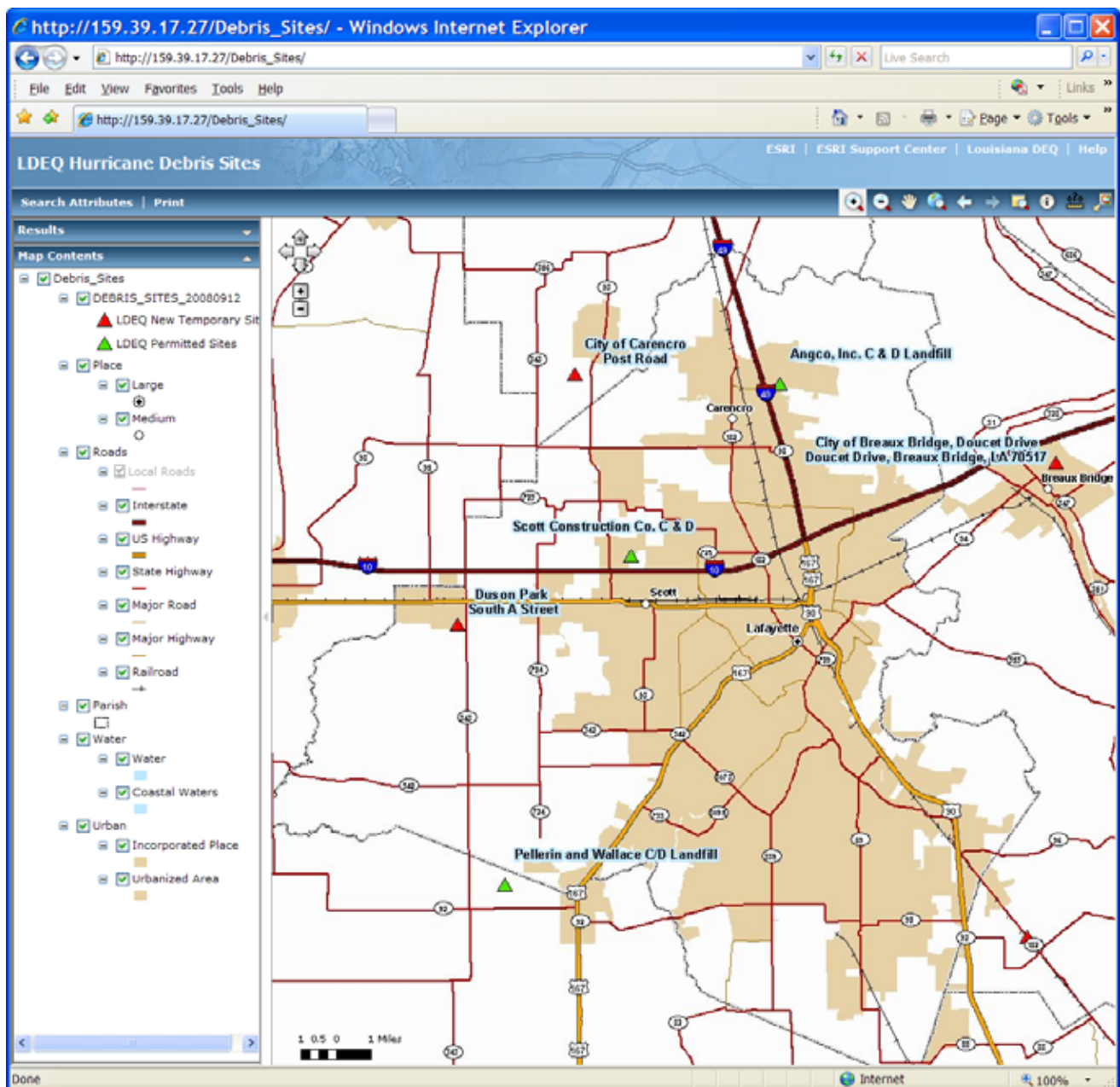
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Acadia Parish



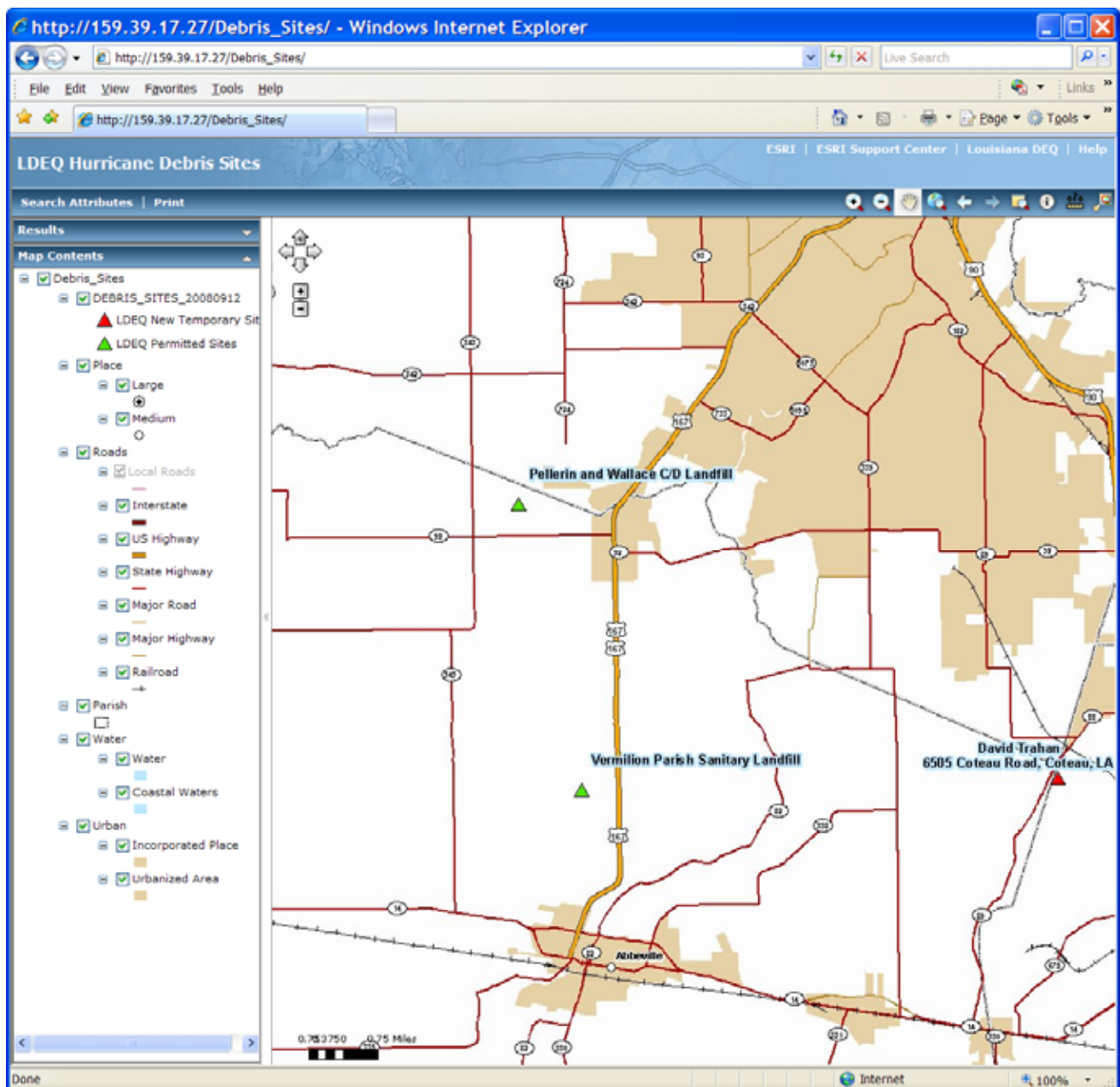
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Lafayette Parish



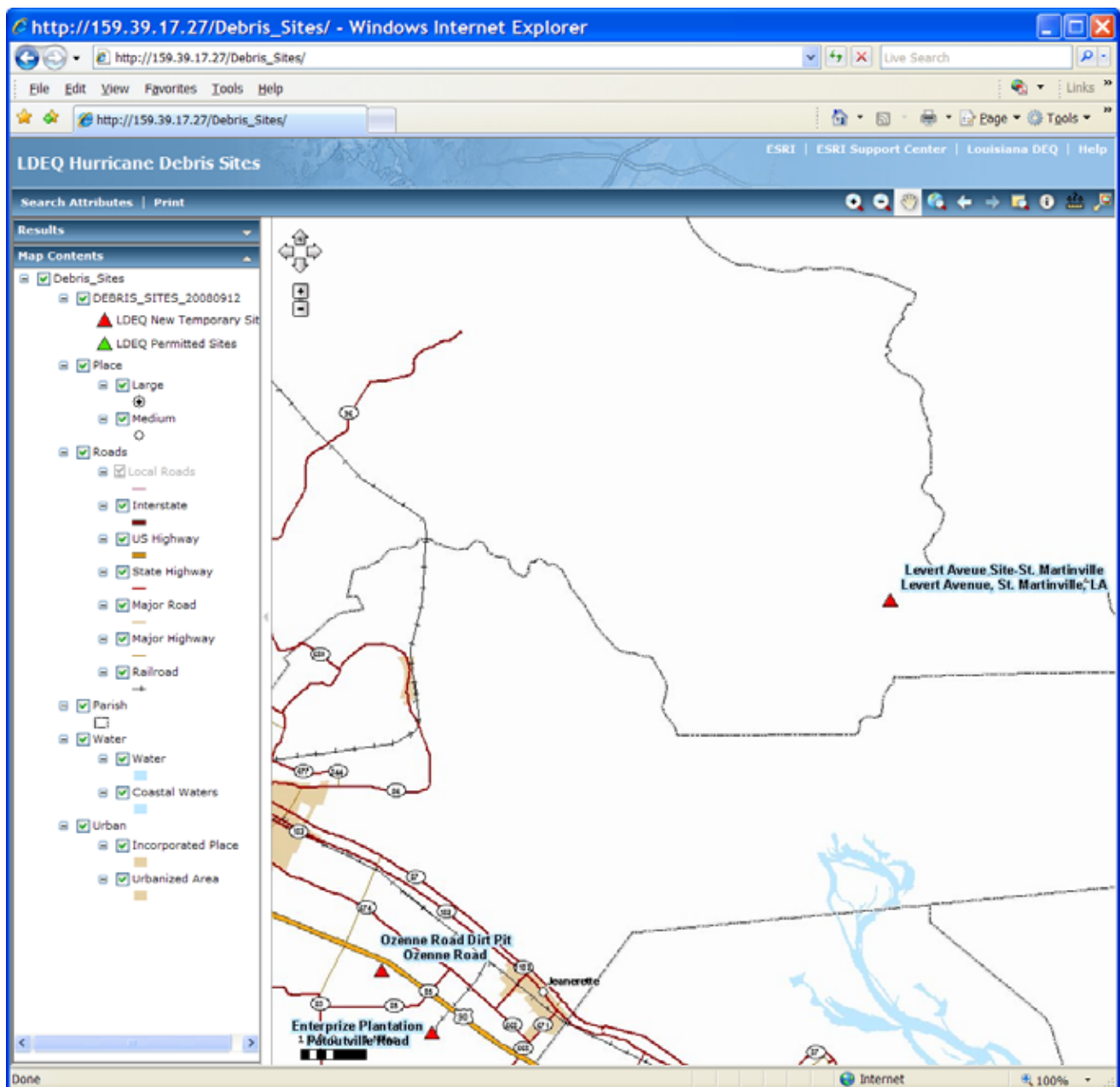
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Vermilion Parish



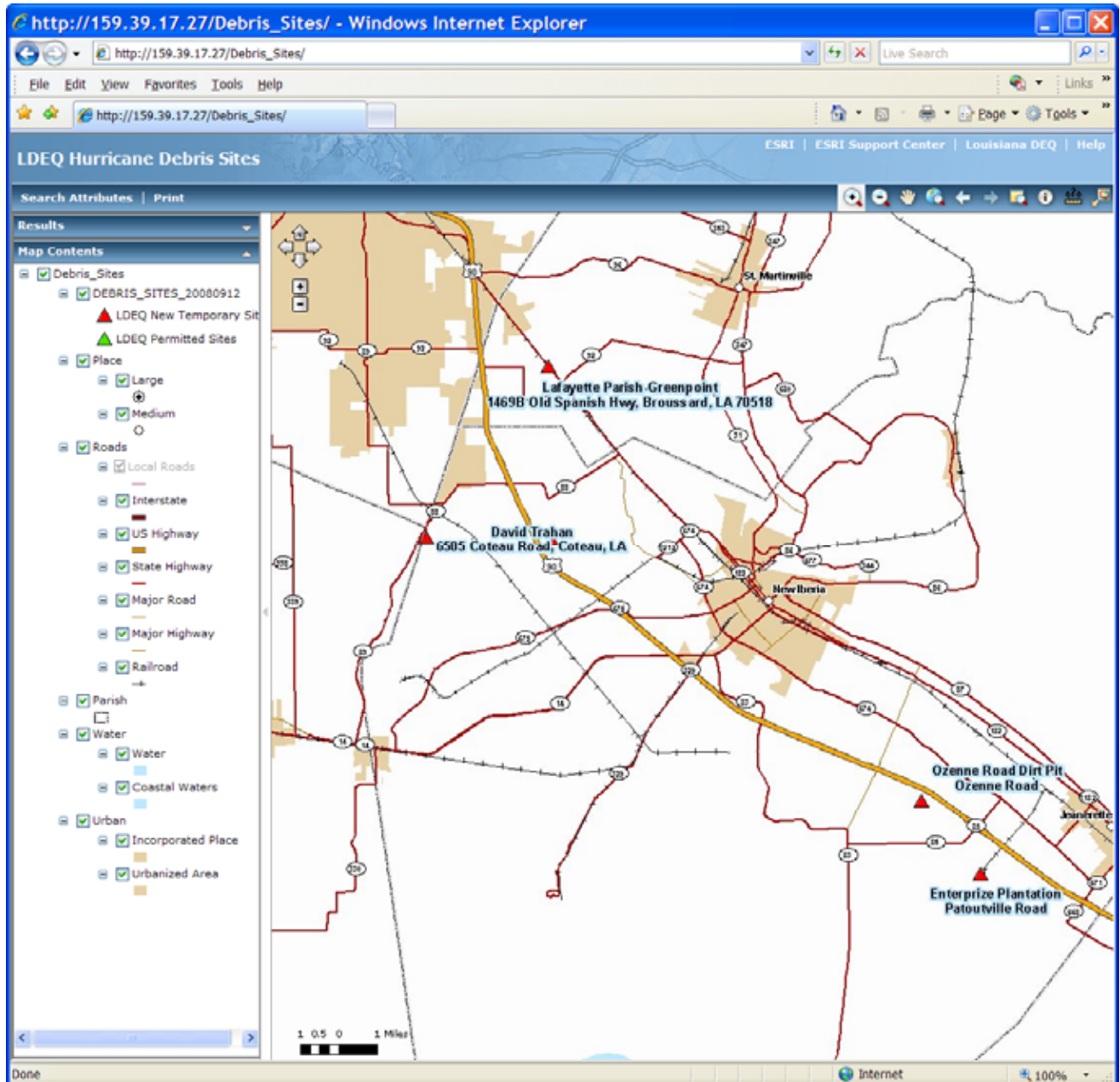
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St. Martin Parish



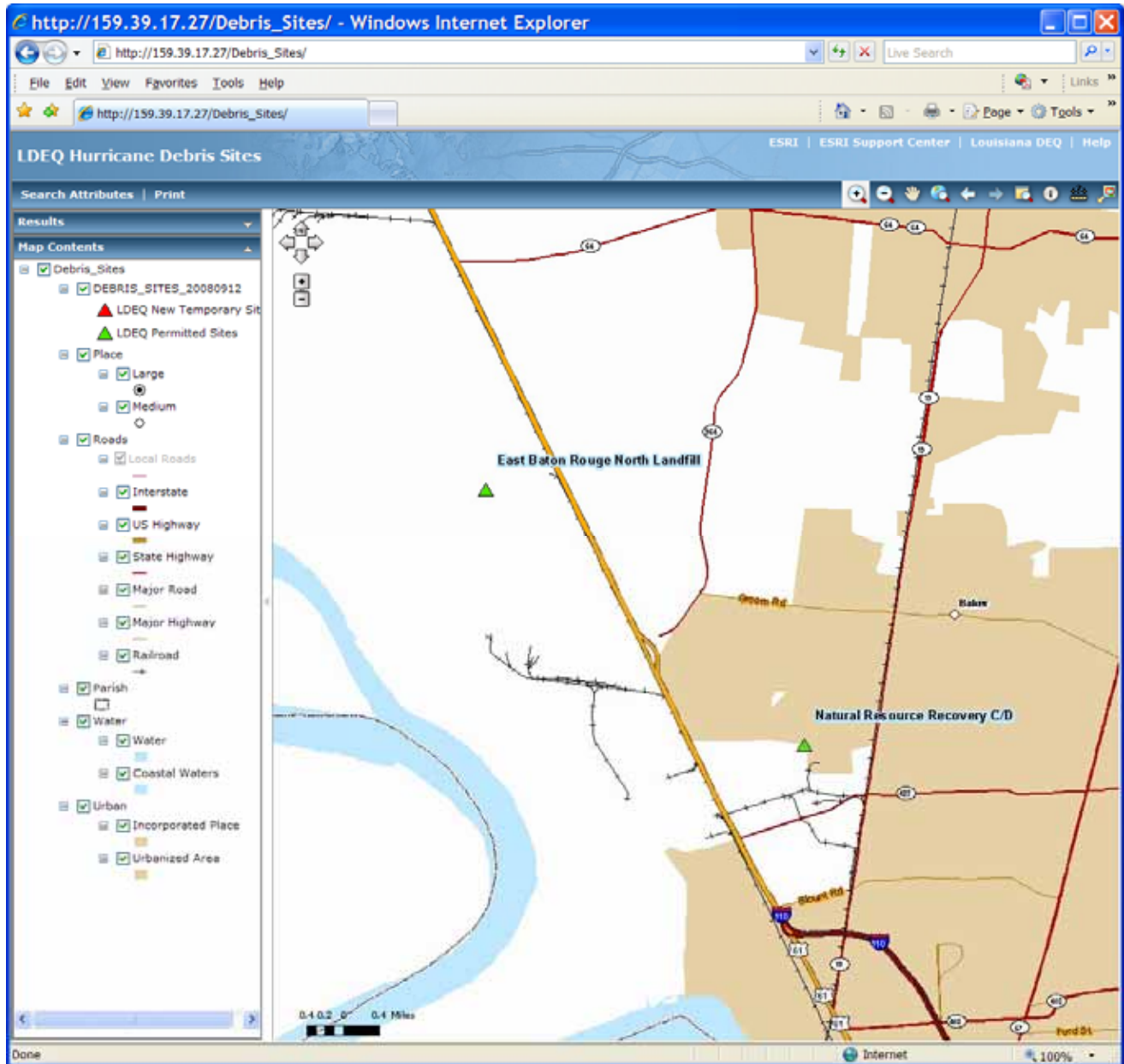
Mapped LDEQ Debris Sites

Iberia Parish



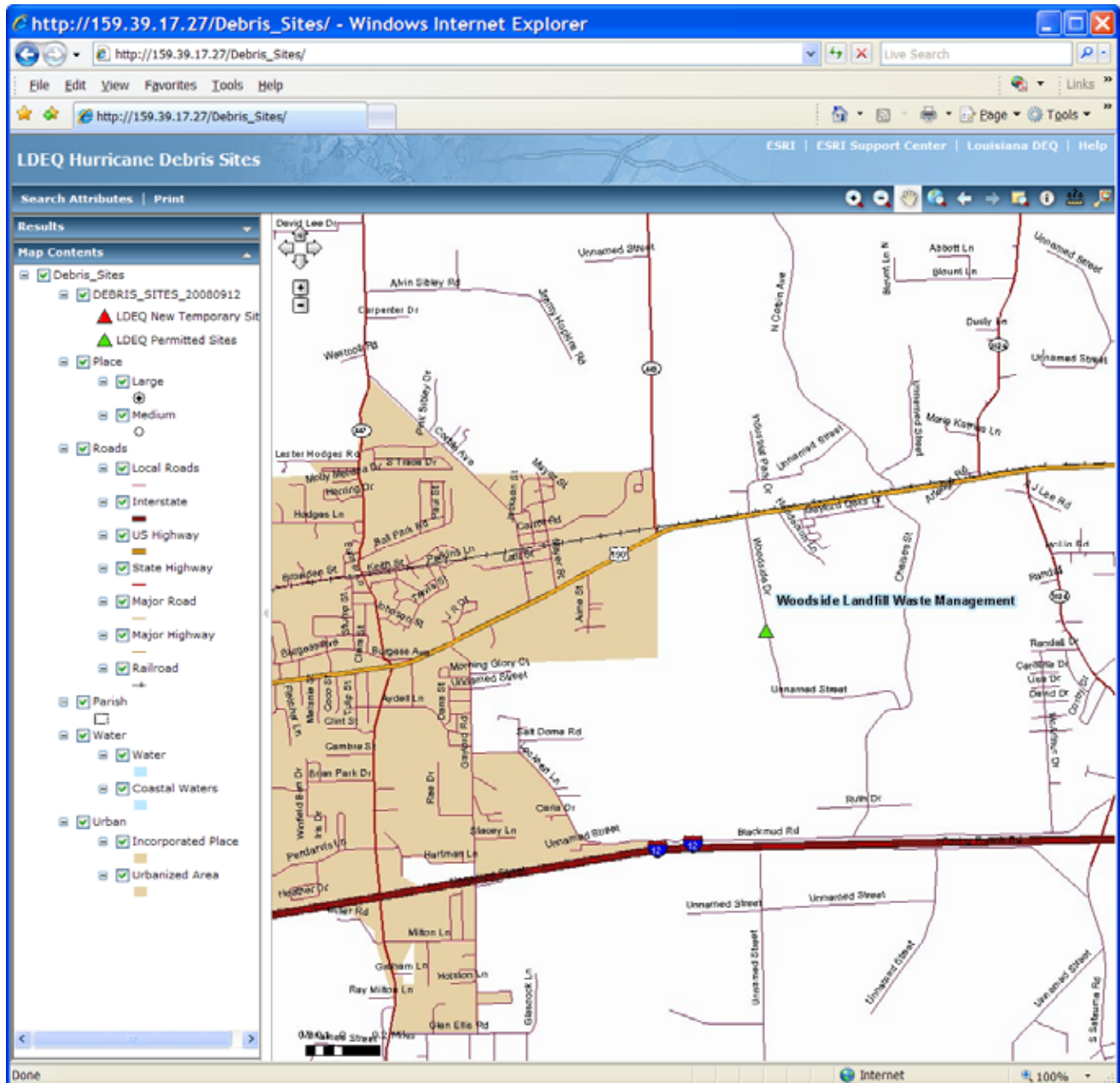
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East Baton Rouge Parish



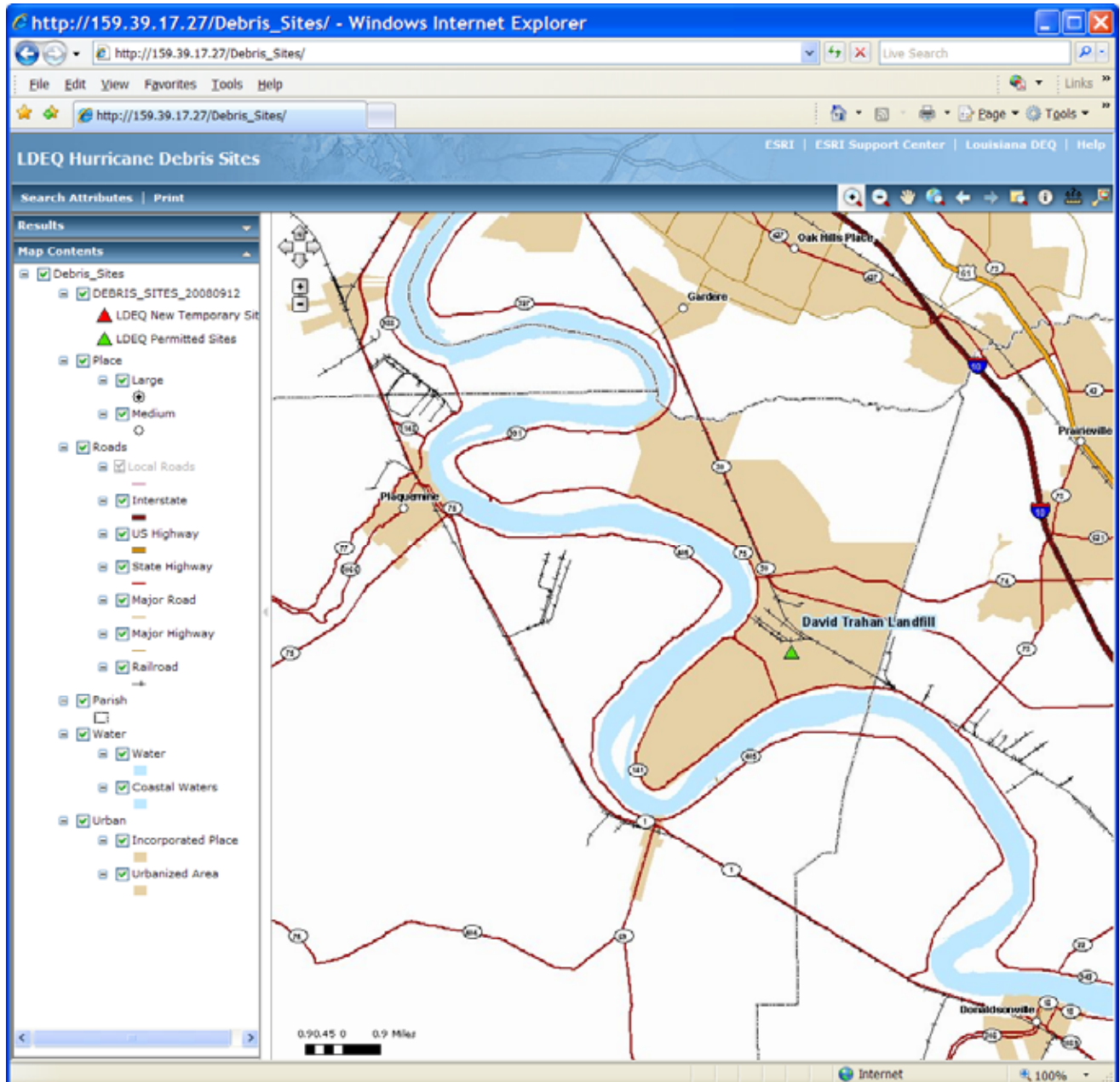
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Livingston Parish



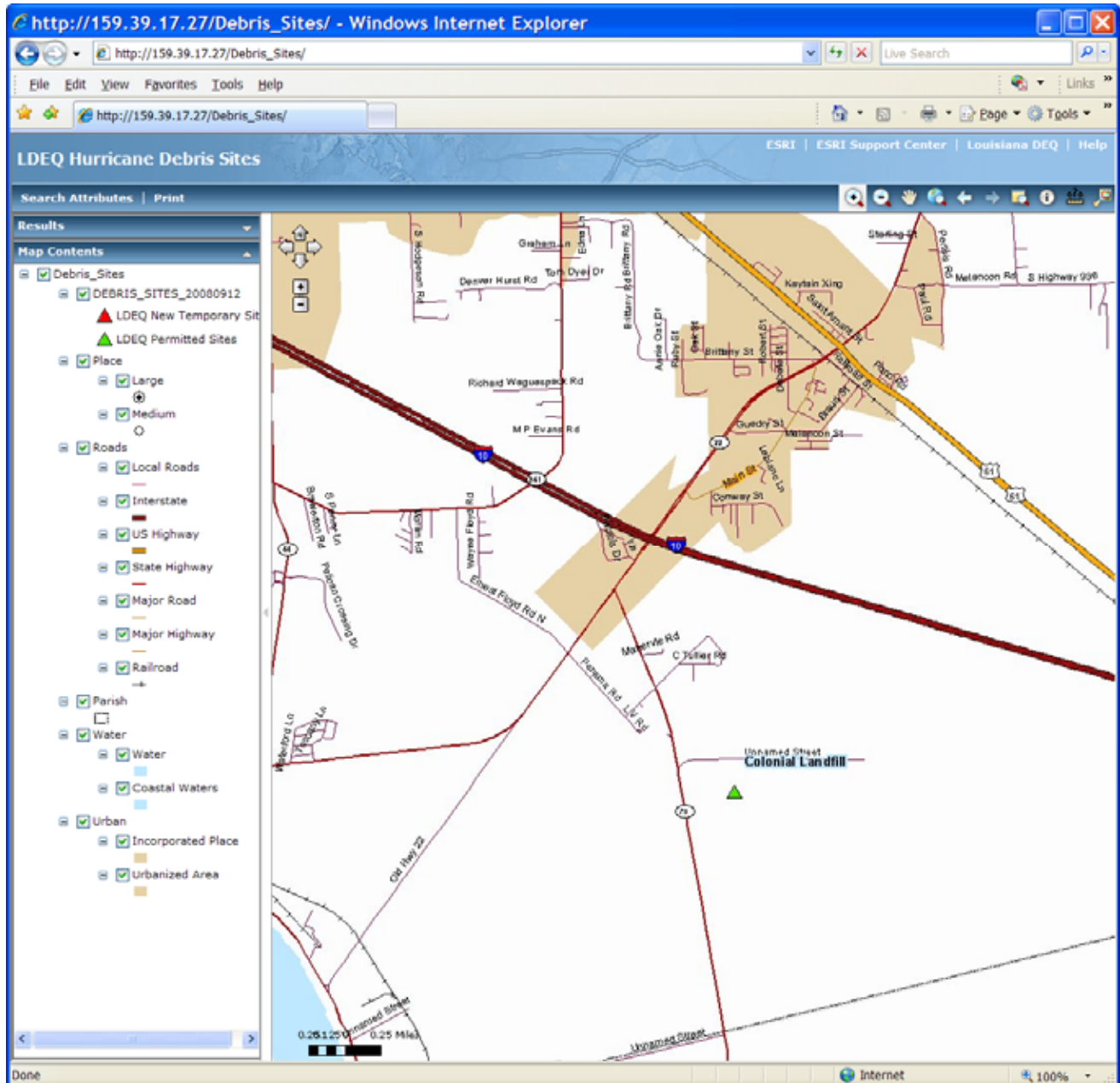
Mapped LDEQ Debris Sites

Iberville Parish



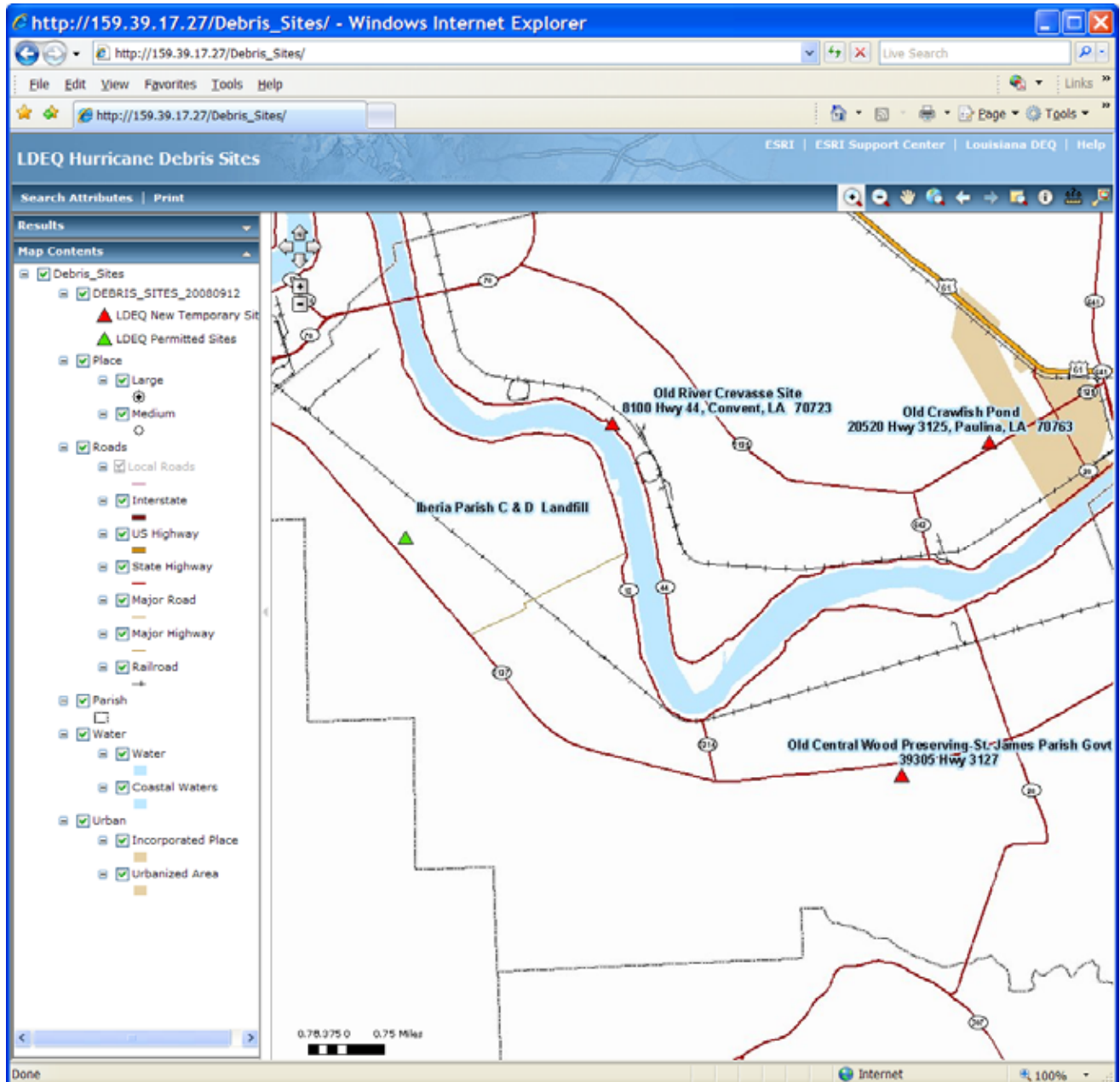
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Ascension Parish



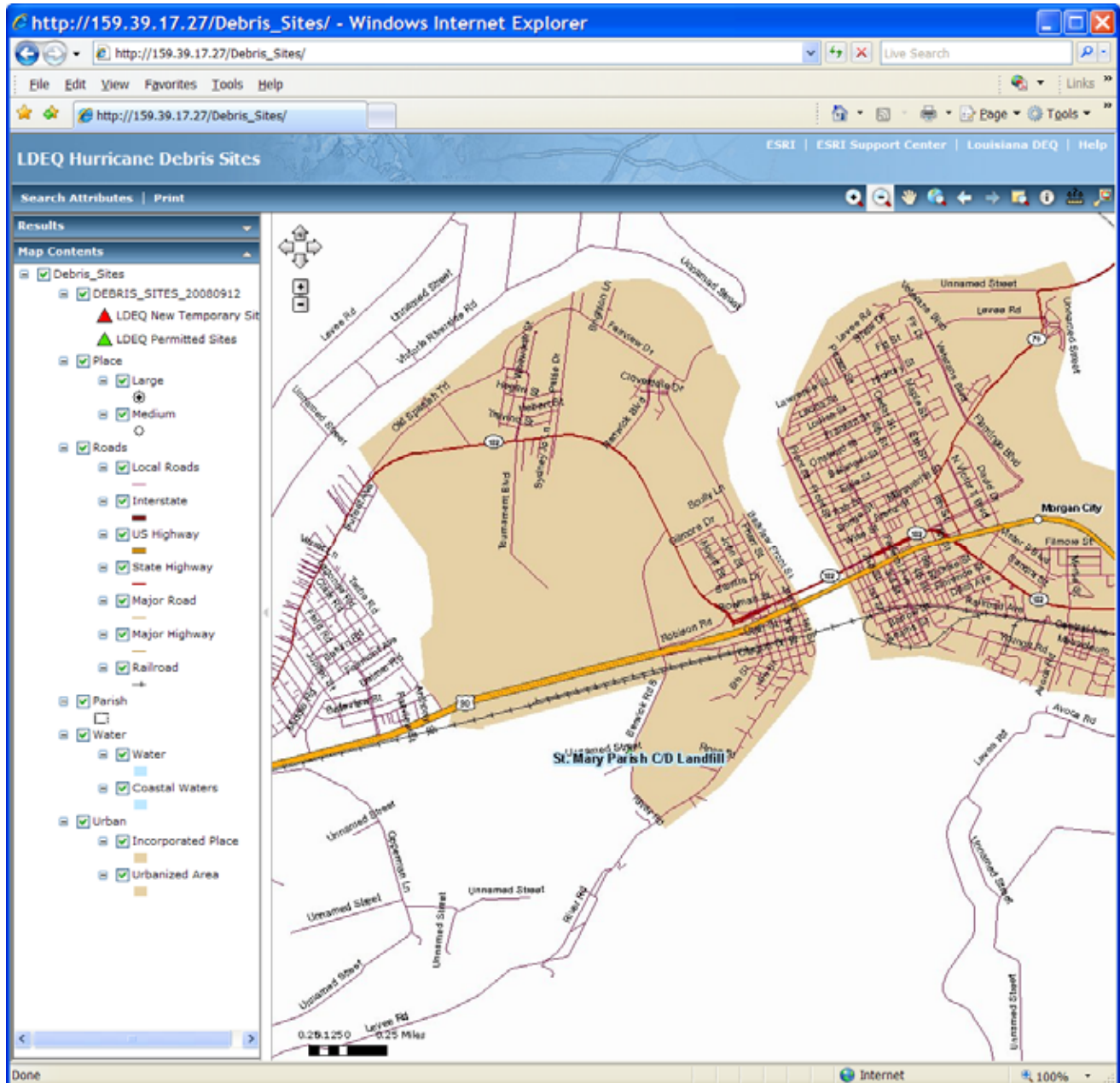
Mapped LDEQ Debris Sites

St. James Parish



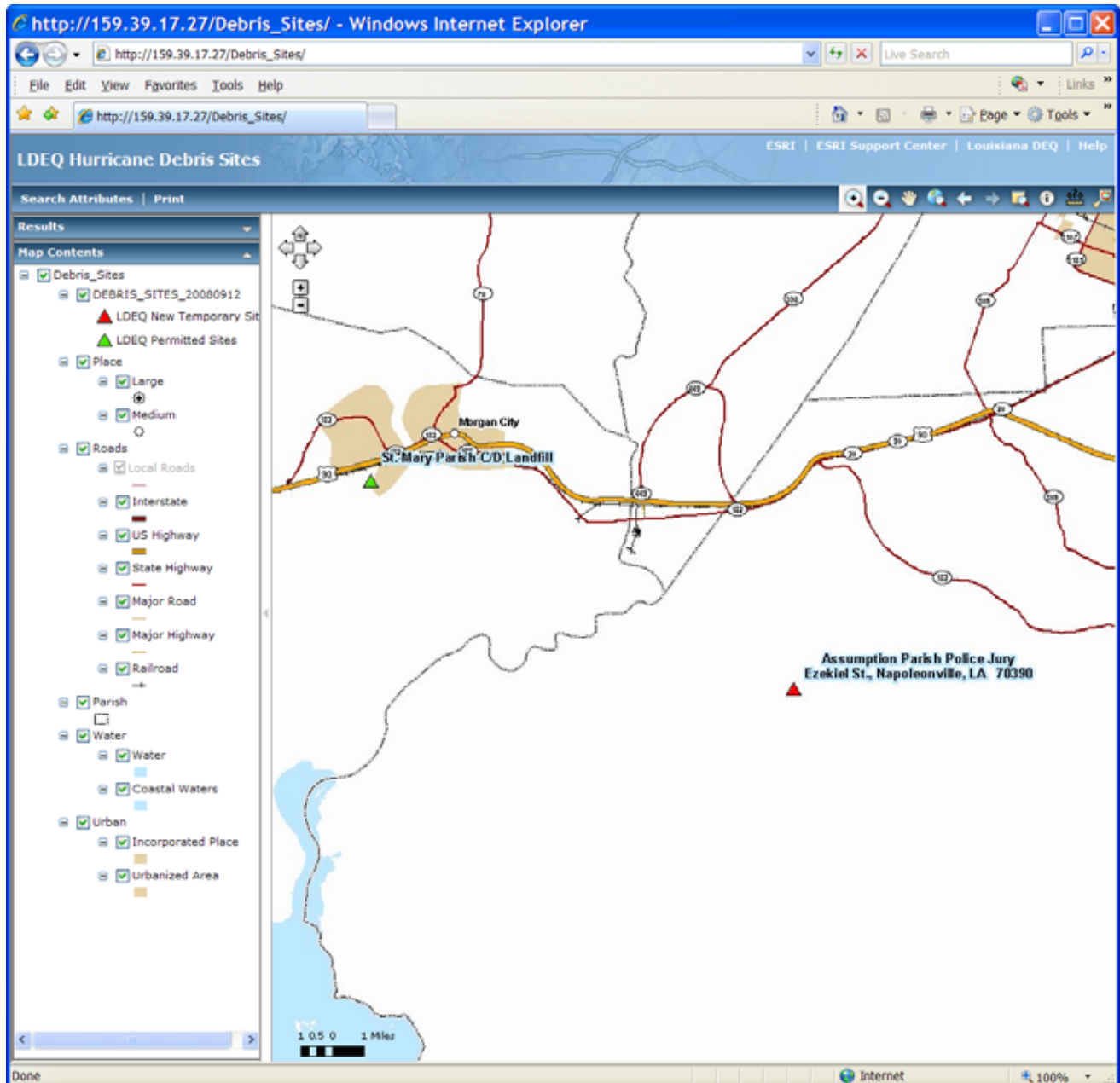
Mapped LDEQ Debris Sites

St. Mary Parish



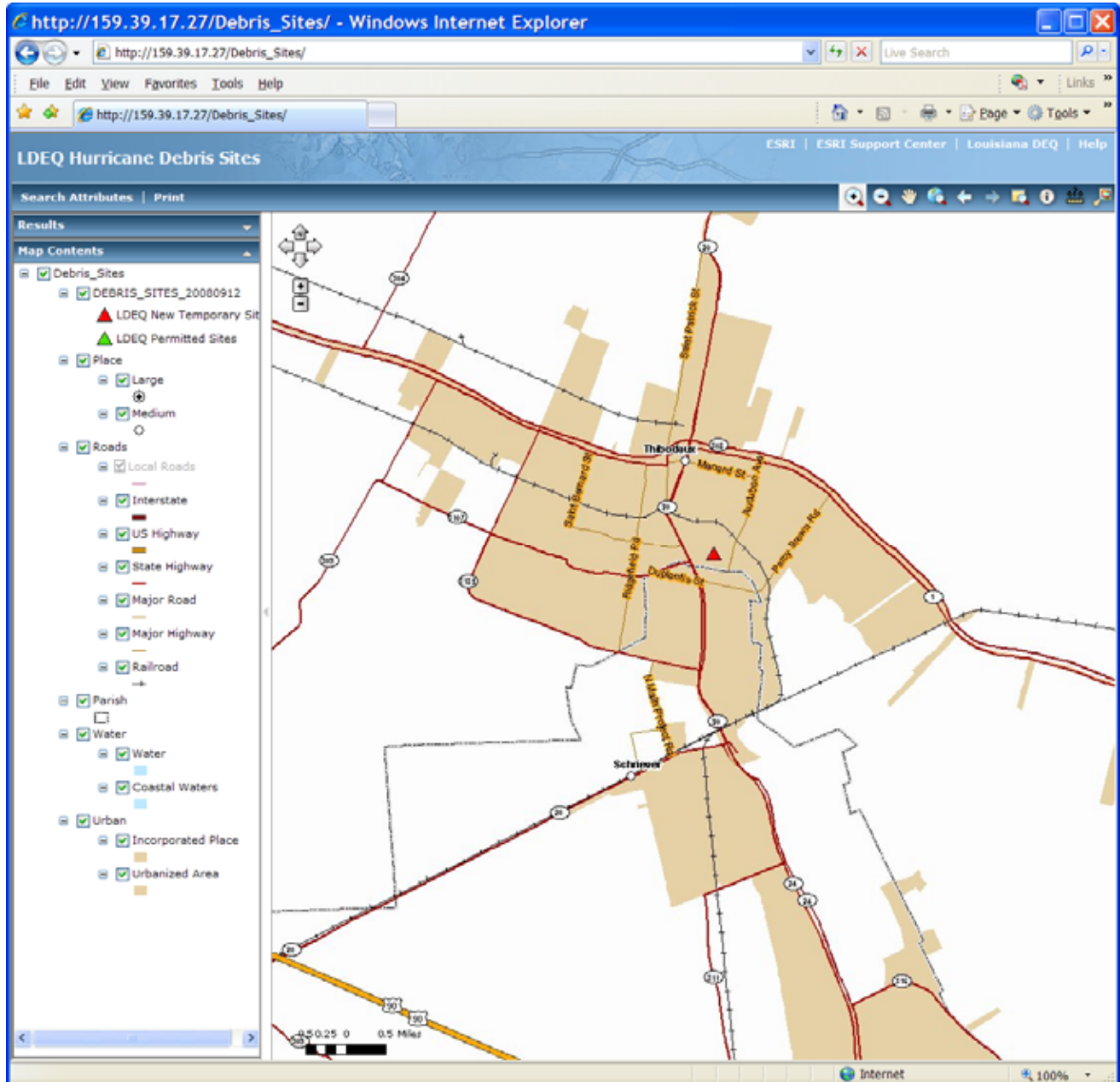
Mapped LDEQ Debris Sites

Assumption Parish



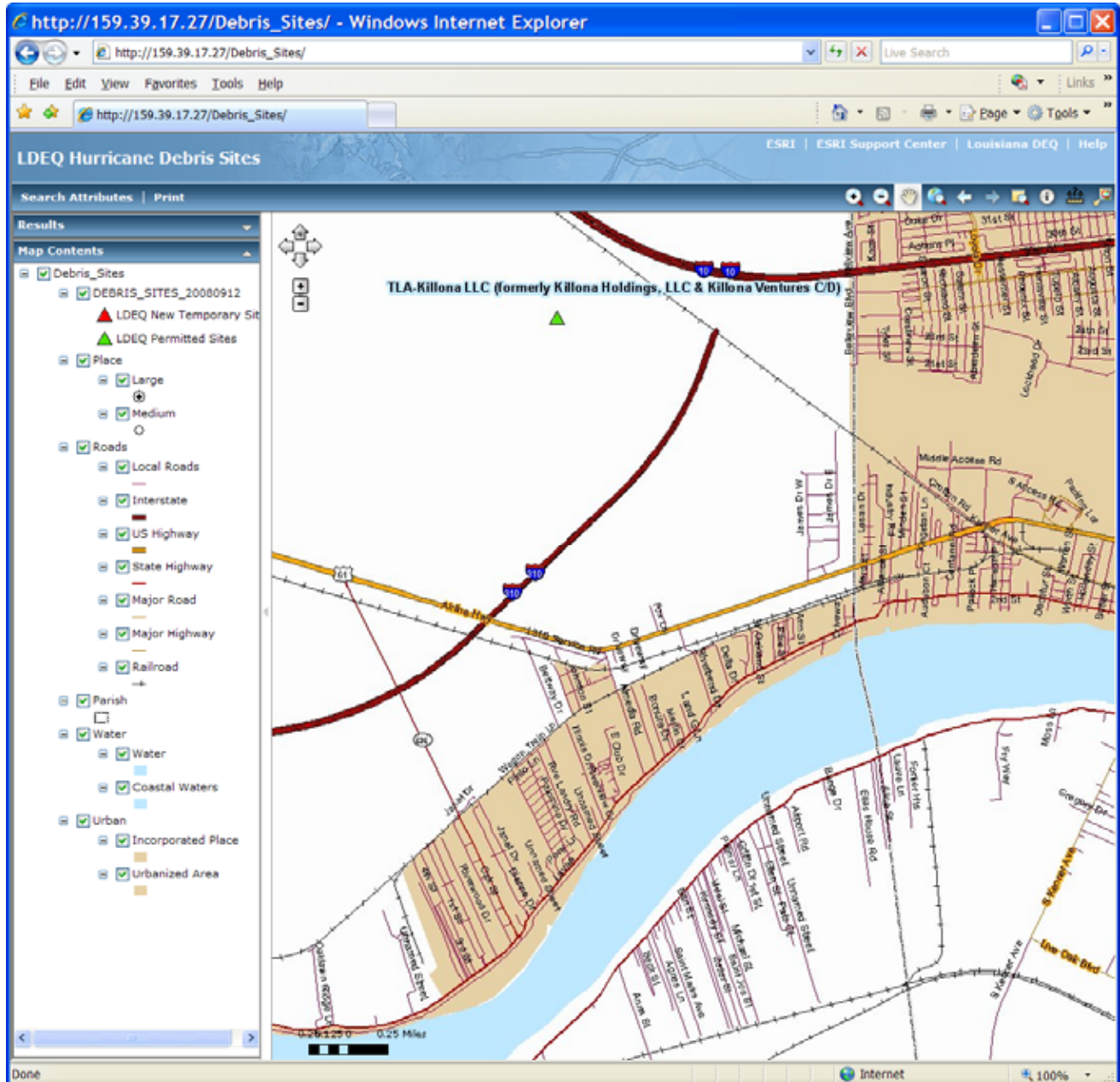
Mapped LDEQ Debris Sites

Lafourche Parish



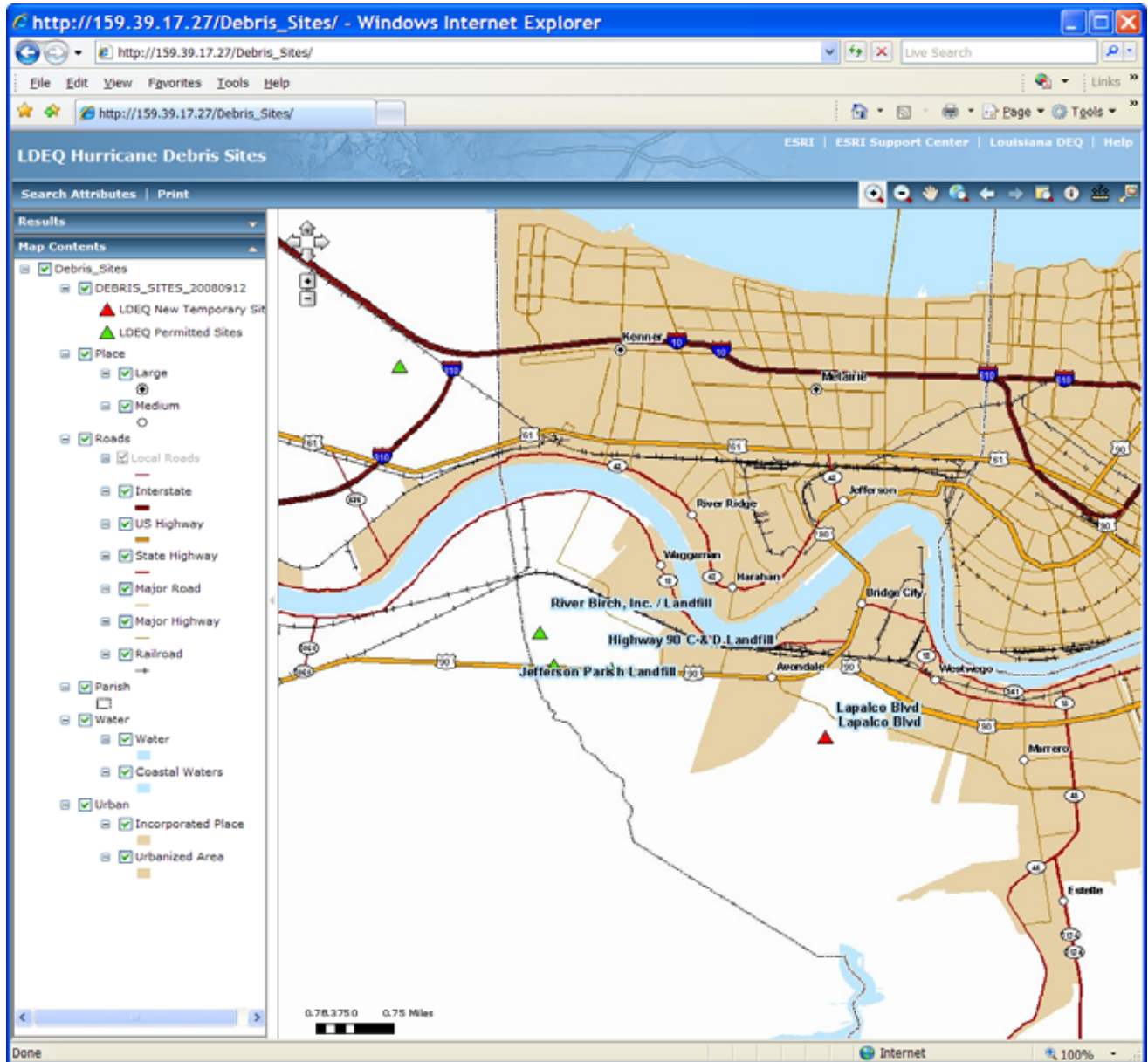
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St. Charles Parish



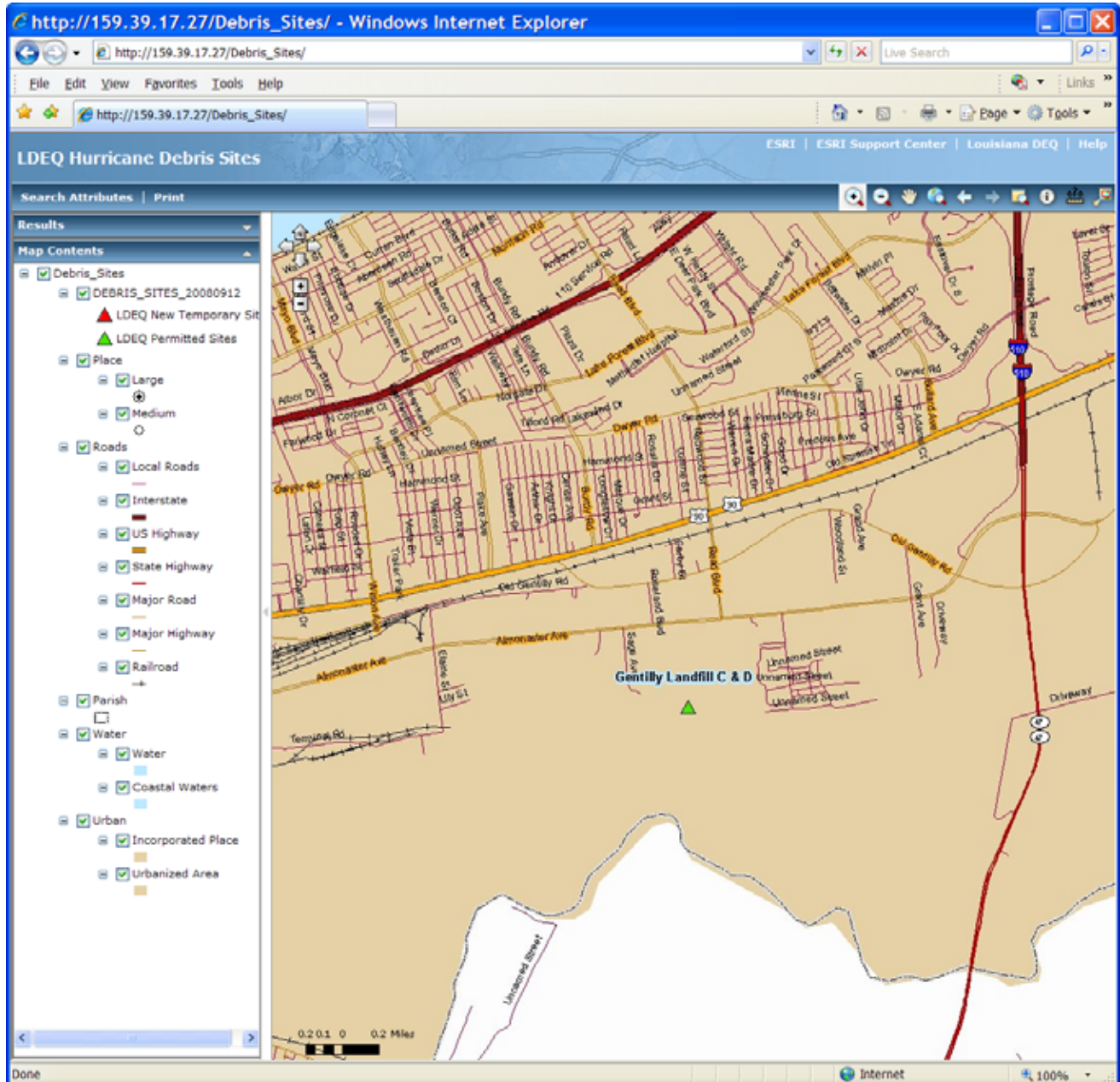
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Jefferson Parish



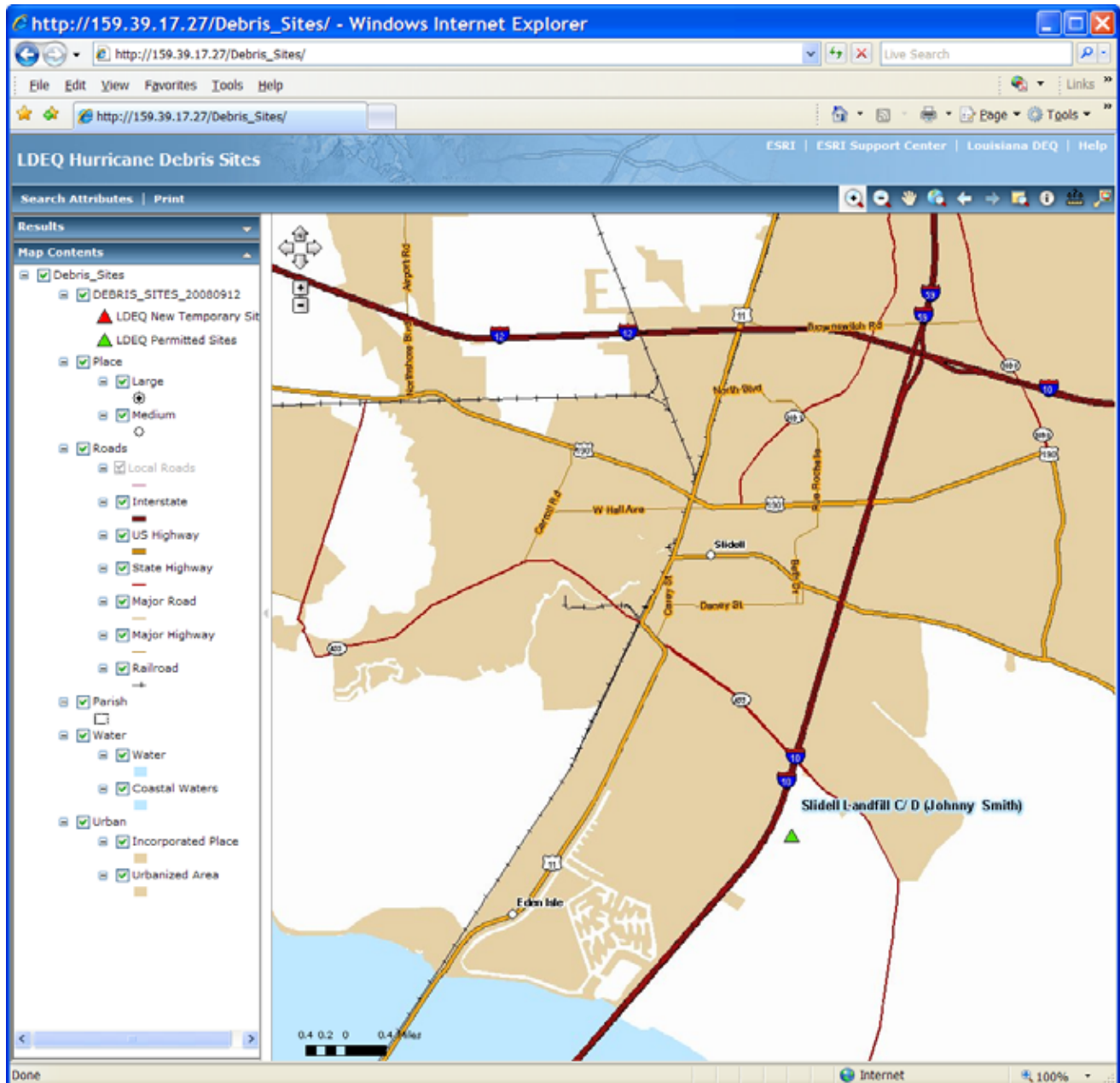
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Orleans Parish



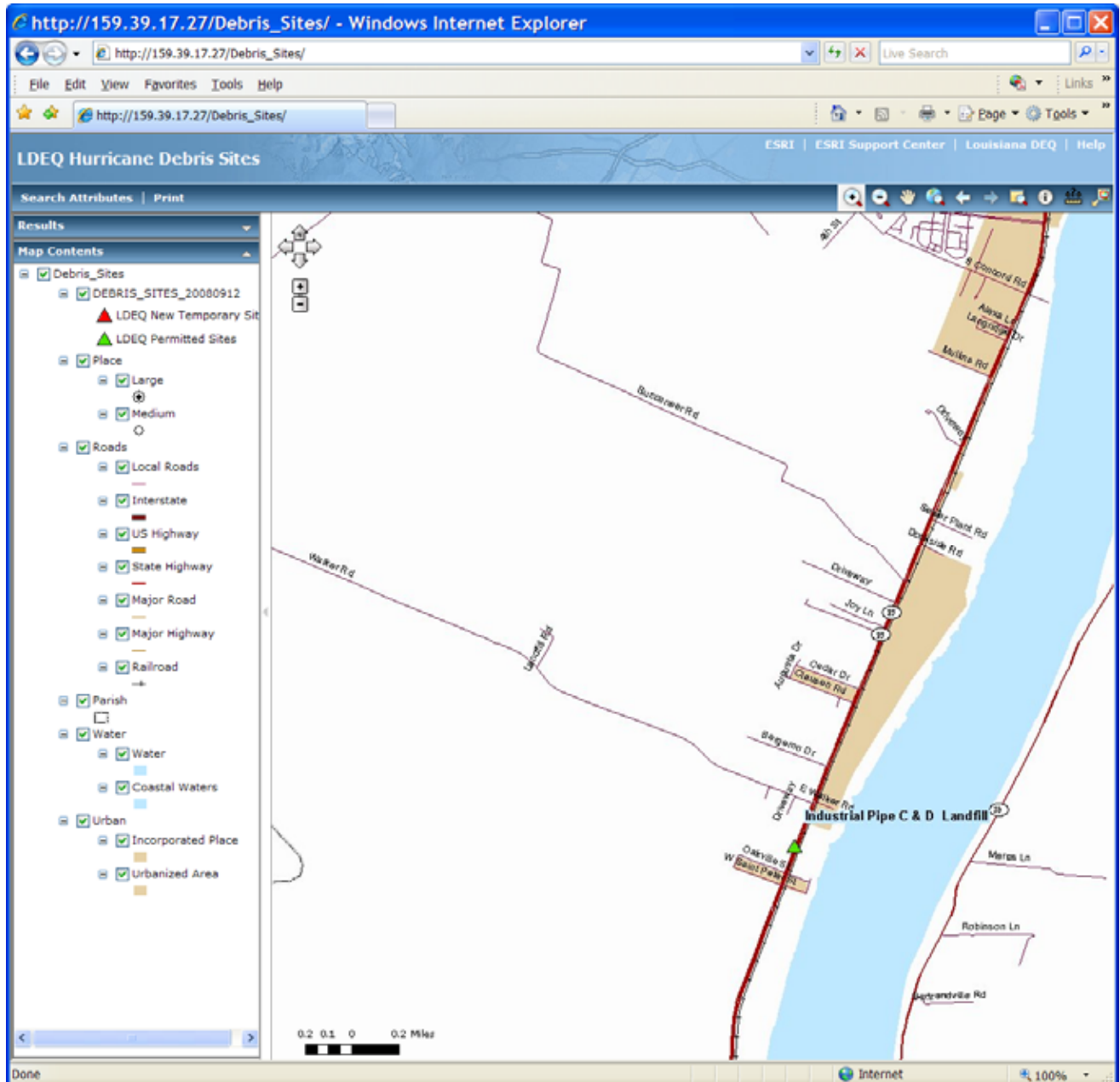
Mapped LDEQ Debris Sites

St. Tammany Parish



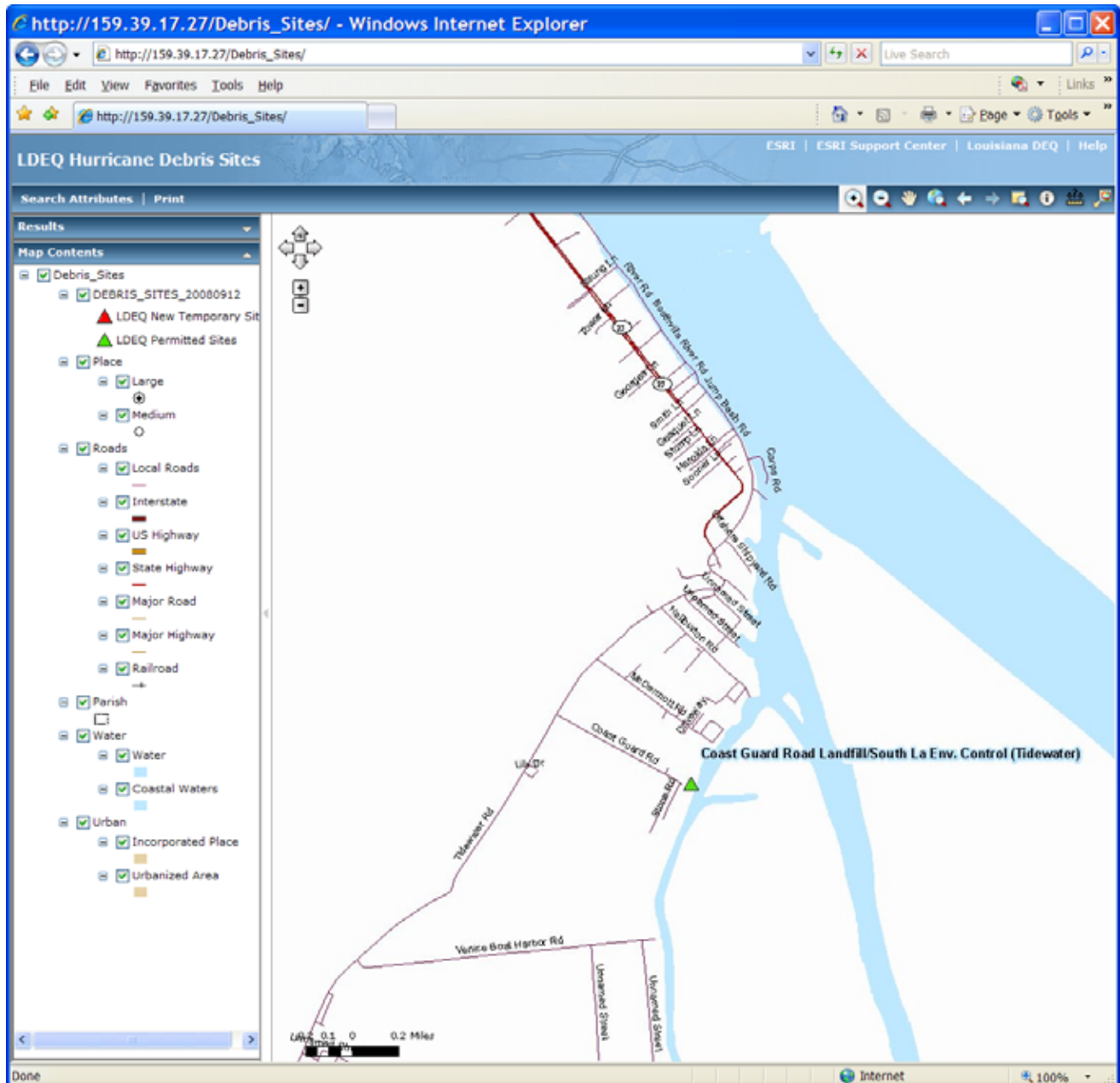
Mapped LDEQ Debris Sites

North Plaquemines Parish



Mapped LDEQ Debris Sites

South Plaquemines Parish



ATTACHMENT C

FACILITY ASSESSMENT REPORT

FACILITY ASSESSMENT REPORT

Region	Parish	WWTPs (majors/sig. minors)			Priority Permitted (P1 & P2)			UST's**			
		Assessments		Total Universe	Assessments		Total Universe	Assessments			Total Universe
		Daily	Total		Daily	Total		Daily	Total	Follow Ups	
Southeast	Jefferson		14	14							
	Lafourche		9	34					90	45	90
	Orleans		4	5					60		
	Plaquemines		7	12					11		
	St. Bernard		8	17					23		
	St. Charles		20	15					30		49
	St. John the Bap.		13	14					41	1	41
	St. Tammany		50	142					13		
	Terrebonne		19	27					126	34	126
	Washington		9	8							
Region Summary		0	197	288	0	5	0	0	394	80	306

Comments Total Assessments includes 44 facilities not specified by parish prior to 9/5.

Region	Parish	WWTPs (majors/sig. minors)			Priority Permitted (P1 & P2)			UST's**			
		Assessments		Total Universe	Assessments		Total Universe	Assessments			Total Universe
		Daily	Total		Daily	Total		Daily	Total	Follow Ups	
Capital	Ascension		113	116		26	35		96	108	96
	Assumption		7	9		6	6		26	36	26
	EBR		35	54		30	41		323		323
	E. Feliciana		7	7			0		18		
	Iberville		16	25		19	32		37	37	37
	Livingston		65	78		3	6		111	5	111
	St. Helena		1	1			1				
	St. James		12	12		17	19		32	18	32
	Pointe Coupee		6	13		2	5		32	33	32
	W. Feliciana		3	8			2		16	14	16
	WBR		18	20		12	17		38	1	38
	Tangipahoa		27	44		6	11				
Region Summary		0	310	387	0	121	175	0	729	252	711

FACILITY ASSESSMENT REPORT

Comments 9/11: No significant problems found at facilities. Priority facility assessments reported as complete. #'s need updating.

Region	Parish	WWTPs (majors/sig. minors)			Priority Permitted (P1 & P2)			UST's**			
		Assessments		Total Universe	Assessments		Total Universe	Assessments		Follow Ups	Total Universe
		Daily	Total		Daily	Total		Daily	Total		
Acadiana	Evangeline		29	29					50		50
	St. Landry		32	32		9			118		118
	Acadia		22	14					42		42
	Lafayette		97	96		2			194		194
	St. Martin		13	9		5			59		59
	Vermillion		17	8		1			53		53
	Iberia		8	9					63		63
	St. Mary		11	9		9			65	21	65
Region Summary		0	229	206	0	43	0	0	644	21	644

Comments Total assessments for Priority facilities include 17 inspections done prior to 9/6 but not reported by parish.

Region	Parish	WWTPs (majors/sig. minors)			Priority Permitted (P1 & P2)			UST's**			
		Assessments		Total Universe	Assessments		Total Universe	Assessments		Follow Ups	Total Universe
		Daily	Total		Daily	Total		Daily	Total		
Southwest	Vernon		29	29							
	Allen		10	10							
	Beauregard		6	6		1					
	Calcasieu		28	28							
	Jeff. Davis		12	12							
	Cameron		8	8							
Region Summary		0	93	93	0	91	0	0	0	0	0

Comments Total assessments for Priority facilities include 90 facilities done prior to 9/6 but not reported by parish.

FACILITY ASSESSMENT REPORT

Region	Parish	WWTPs (majors/sig. minors)			Priority Permitted (P1 & P2)			UST's** see note above			
		Assessments		Total Universe	Assessments		Total Universe	Assessments			Total Universe
		Daily	Total		Daily	Total		Daily	Total	Follow Ups	
Northeast	Union			4							
	Morehouse		2	8		1					
	W. Carroll			4							
	E. Carroll			2							
	Lincoln			9							
	Ouachita		3	38		6					
	Richland			5							
	Madison			4							
	Tensas			2							
	Franklin			8							
	Caldwell			3							
	LaSalle			3							
	Catahoula			4							
	Grant		2	7							
	Concordia			2							
	Avoyelles		6	8					136	28	136
	Rapides		4	17		8			188	11	188
	Jackson			8							
	Winn		2	3		1					
Region Summary		0	32	139	0	26	0	0	324	39	324

Comments

FACILITY ASSESSMENT REPORT

Region	Parish	WWTPs (majors/sig. minors)			Priority Permitted (P1 & P2)			UST's** see note above			
		Assessments		Total Universe	Assessments		Total Universe	Assessments		Follow Ups	Total Universe
		Daily	Total		Daily	Total		Daily	Total		
Northwest	Caddo		37	21		1					
	Bossier		43	22		3					
	Webster		18	13		1					
	Claiborne		5	6							
	Bienville		11	6							
	Red River		3	3							
	DeSoto		13	7							
	Sabine		29	6		1					
	Natchitoches		21	13							
Region Summary		0	180	97	0	6	0	0	0		0

Comments 9/11:No problems noted
Total assessments may include Water Minor assessments. Total Universe # does not incl. Water Minors.

Regional Summary											
Region		WWTPs (majors/sig. minors)			Priority Permitted (P1 & P2)			UST's** see note above			
		Assessments		Total Universe	Assessments		Total Universe	Assessments		Follow Ups	Total Universe
		Daily	Total		Daily	Total		Daily	Total		
Acadiana		0	229	229	0	43	0	0	644	21	644
Capital		0	310	387	0	121	175	0	729	252	711
Northeast		0	32	139	0	26	0	0	324	39	324
Northwest		0	180	97	0	6	0	0	0	0	0
Southeast		0	197	288	0	5	0	0	394	80	306
Southwest		0	93	93	0	91	0	0	0	0	0
All Region Summary		0	1041	1233	0	292	175	0	2091	392	1985

Comments

ATTACHMENT D

WATER UTILITY REPORT

Water System Status Report

DHH - OPH Safe Drinking Water Program

OPH	BWACustomers	Total Customers	% on BWA	% Safe to Drink
R1	2	309251	0%	100%
R2	263	194280	0%	100%
R3	161	127426	0%	100%
R4	5265	202293	3%	97%
R5	7653	97928	8%	92%
R6	672	113518	1%	99%
R7	36014	183935	20%	80%
R8	0	135011	0%	100%
R9	109	127252	0%	100%
STATE TOTAL	50139	1490894	3%	97%

ATTACHMENT E

SPIILLS/RELEASES REPORT

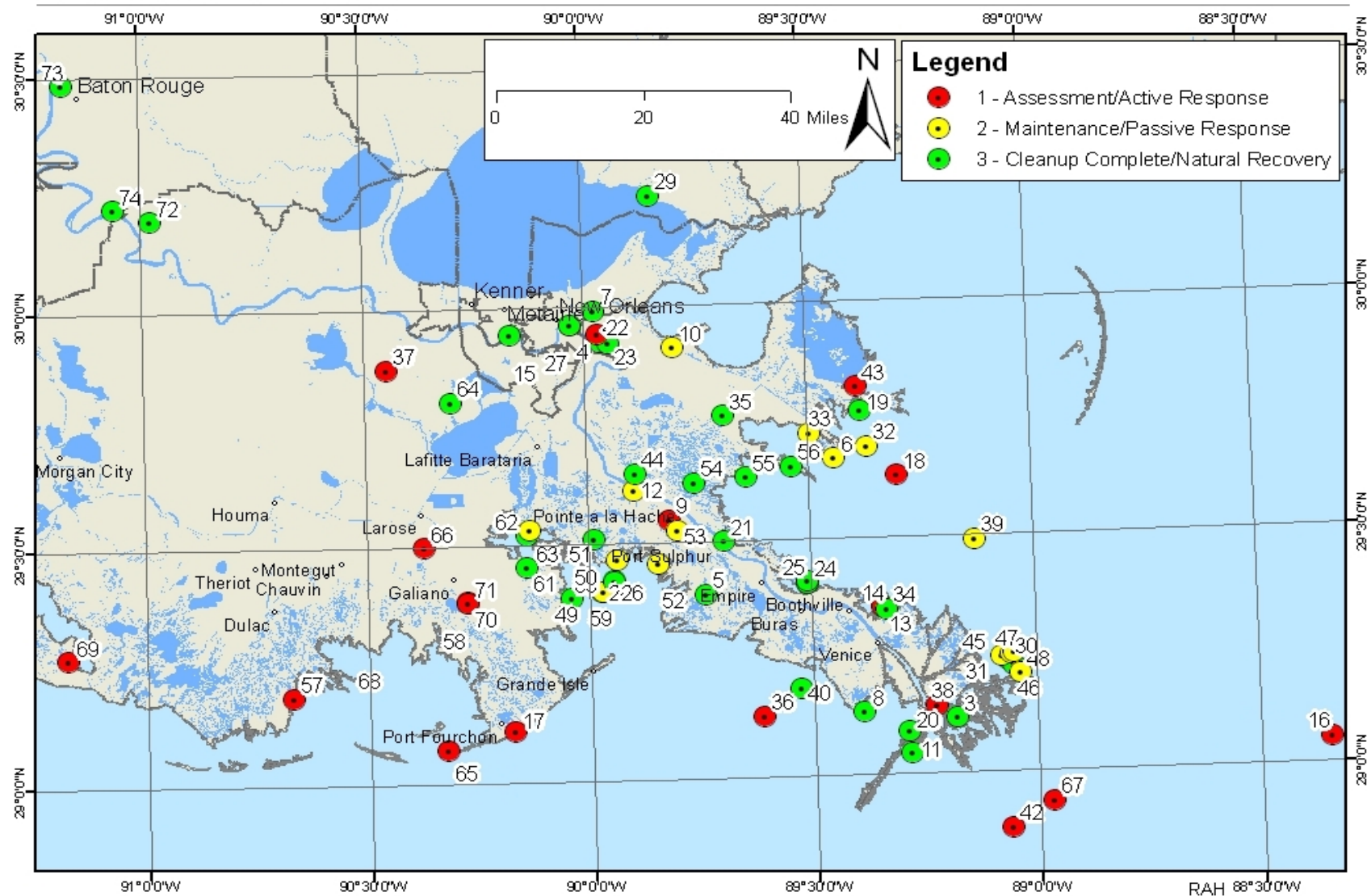
UNIFIED COMMAND SPILL LOG

Hurricane Gustav

Incident Locations
prepared by NOAA

Date: September 11, 2008

USE ONLY AS A GENERAL REFERENCE



UNIFIED COMMAND SPILL LOG

ID	Status	Date/ Time	NRC #	Location	Product Amt	Sheen / Slick size / color	Source Description	RP	Update	Future Actions
1	3	4-Sep-08	882643	Quarantine Bay Field	Crude	Unknown	Leaking well head	Cox Operating LLC	<p>Contacted RP to ensure source secured 7SEP08 (NOJOY).</p> <p>7SEP08 Left message with RP. Requested CBP Overflight 7SEP08.</p> <p>8Sep08 - Contacted Tim, Cox is checking all of their facilities and equipment. Will send all of the lat/longs to verify that they have been checked.</p> <p>9SEP08 - CG overflight sighted a .5 mile x 20ft barely discernable sheen. Well head still leaking, nothing recoverable.</p> <p>10Sep08 Noticed that ID# 24 is possibly duplicate entry. MST1 Wilkes</p>	No further action required.
2	3	6-Sep-08	882934	Barataria Bay		Large pocket of black oil, with large rainbow sheen extending out about .5 mile.	Possible leaking pipeline	Possible Exxon	<p>LDEQ left messages with Ben Arcement - (985) 537-4805 and (985)397-2921. Exxon Raceland Office. There are no wells near this location. LDEQ has an old map which shows an "Exxon" pipeline crossing Barataria Bay (East-West direction) at or near here. I have attempted to call ExxonMobil Pipeline Company, 800 Bell Street, Houston, TX at (713) 656-3440 and got Tim Martin's voicemail. I left a message regarding the potential leak and my phone numbers. I also tried (713) 656-0227 and left a message on Kevin McCrae (Manager - Safety, Health, and Environmental Department). LDEQ contacted Benton Arcement of Exxon Mobil. They are conducted an overflight and will also check by a waterborne asset as there is a pipeline in the area. 7SEP08 DEQ received word from facility that pipeline not leaking. 8Sep08- CG and DEQ conducted separate overflights and no sheen or oil was located in the area. 9Sep08 - CG overflight sighted no sheen or oil in area.</p>	CG amd LDEQ overflights from 8 & 9 Sep 08 revealed no sheen or oil in vicinity. No further action required.
3	3	4-Sep-08		Garden Island Bay Field	Crude	Unknown	Oil discharging from a compressor station.	Dune Energy	<p>7SEP08 Contacted RP. Left message at Corporate Office. Requested CBP Overflight 7SEP08. Dune has responded and secured source, reported 1 quart discharged total.</p>	No further action needed
4	1	5-Sep-08		IHNC			OSV Gulf Fleet No. 39		<p>ES&H was o/s pumping out the Gulf Fleet 39. Mr. Penross Jackson of ES&H estimated that there was approximately 1 Barrel of oil product on the vessel. ES&H is having some logistical issues on where to dispose of the waste. The facility they normally use sustained some damage during Gustav. They hope to finish 39 today, then move consecutively to the other vessels. Gulf Fleet 33, then the Pennsylvania Trader. Schaus and Concepcion surveyed the other areas and documented the location of drums on site. We spoke with a Louis (not sure of his last name) and instructed him that if Hurricane Ike threatens to affect us then they would have to remove those drums. To our, and ES&H's knowledge those are the only potential pollution threats there.</p> <p>10 Sep 08 ES&H reported that the Gulf Fleet 39 has been lightered and is complete. Southern Scrap then instructed ES&H to depart and that their services were no longer needed. ES&H believes that there is still product that may cause harm to the environment o/b the Gulf Fleet 33 and the Pennsylvania Trader. MST1 Wilkes 11SEP08 Possible further cleanup needed on Gulf Fleet 33 and Pennsylvania Trader.</p>	Follow up w/ RP. OSRO stated that RP does not intend to remove oil from Gulf Fleet 33 or Pennsylvania Trader.
5	3	5-Sep-08	882642	Lake Washington		silvery sheen 1.5 miles x 50'	Swift Facility CM3 Facility sump and leaking well		<p>7SEP08. Contacted ES&H. ES&H en-route to investigate. 8Sep08 - Currently pumping all of the liquids out of the sumps</p>	No further action needed
6	2	3-Sep-08	882846	Breton Sound, Main Pass	20 BBLS	5-10 BBLS black (50 yds x 50 yds)/rainb ow (1 mile x 1 mile)	Damaged tank battery (concrete barge facility),	Yuma Petroleum Company	<p>Contact ES&H Robert Cannon</p> <p>5 September- USCG on scene with OMI deployed 500 feet of boom, discovered approximately 20 oiled brown pelicans. Yuma takes responsibility.</p> <p>6 September- USCG, FWS, ES&H, Yuma on scene recovered all recoverable oil and 17 oiled pelicans.</p> <p>8 September- 10 pelicans released, crane barge on-scene to begin salvage operations of concrete barge. RP: Yuma. Original FPN: N08064 - \$15k - Oil Mop.</p> <p>10 Sep 08 Talked to Rob Cannon, all live birds have been cleaned and released. Any casualties or critical care animals have been transferred to Baton Rouge facility. ES&H is en route this morning with sorbent pads to recover any residual oil that has leached from marsh. Remediation will continue on an as needed basis. Call for Updates. Noticed to be duplicate of #32 MST1 Wilkes</p>	10 Sep 08 Continue clean-up and UC oversight. Contact facility to ensure Hurricane Plan enacted prior to storms. MST1 Wilkes
ID	Status	Date/	NRC #	Location	Product	Sheen / Slick size	Source	RP	Update	Future Actions

UNIFIED COMMAND SPILL LOG

		Time			Amt	/ color	Description			
7	3	4-Sep-08	882767	Intersection of Industrial Canal and MRGO			Sheen coming from crew boat being salvaged. PI team enroute.	Southern Scrap	PI team reported that there were two "junk" boats that were being salvaged that sheen was coming off of. Southern Scrap claimed that ES&H had been hired to clean the vessels before they were scrapped. The vessels were boomed off and PI called in an NRC report. 6SEP Contacted Southern Scrap OSV Gulf Fleet No. 39. (ES&H) Contacted Southern Scraps. Plan to remove all oil products from vsl on Monday 8 SEP. Vsl located at IHNC.	Duplicate CASE
8	3	4-Sep-08	882804	Hilcorp West Bay field	*deq duplicate #15	Sheen from Central Facility			P.O. BOX 61229, HOUSTON, TX 77208-1229, (713)209-2400	Duplicate CASE
ID #	Status	Date/ Time	NRC #	Location	Product Amt	Sheen / Slick size / color	Source Description	RP	Update	Future Actions
9	1	5-Sep-08	882912	Grand Bayou (Diamond Field)	100 BBLs Black Oil		Reported by DEQ overflight - marsh impact	Energy and Exploration	7SEP08: LDEQ contacted Douglas Bradford. OSRO continuing clean-up. 10 Sep 08 PO Concepcion is conducting contractor oversite. Update to follow. MST1 Wilkes 10 Sep 08 USES is O/S continuing to collect discharged oil. The focus of the cleanup today was oily debris and containing heavy rainbow sheening by deploying 16,480 feet of 5 inch sorbent boom, 1,100 feet of containment boom and 06 bails of sorbent pads. LDEQ rep John Calvin will be O/S on 11 Sep 08 to discuss options on dealing with oiled vegetation. MST1 Wilkes 11SEP08 LA DEQ didn't go out due to inclement weather and will follow up on Friday if weather permits. Will not be available on the weekend. MST1 McGregor	Continue clean-up and UC oversight. Contact facility to ensure Hurricane Plan enacted prior to storms.
10	2	2 Sep 08/ 1110		MM50 MRGO- 15-20ft from RDB	Diesel	Light rainbow sheen around barge with some possible hydraulic fluid.	Inland drilling rig on its side in MRGO. Approx. 8,000 gallons of fuel on board on its side.	Unknown	Rig has been boomed off. Approximately 5-10 gallons of diesel discharged. Contact #: Richard Grayson. 10 Sep 08 PO Klostermeyer conducted overflight. No pollution was seen in the area. Source was secured. Barge remains properly boomed. MST1 Wilkes	10 Sep 08 Contact O/O to ensure Hurricane / Response Plan enacted prior to storms. Follow up overflight recommended. MST1 Wilkes
11	3	4-Sep-08	882922	South Pass 24	Crude	Unknown	Leaking well head	Energy Partners	7SEP08 Contacted RP. Well shut-in. Source Secured.	Source secured. No further action required.
12	2	4-Sep-08		MM55 LMR RDB	Sheen	Sheen approximately 400ft x 15 ft light silver and broken	Unknown	Sundown East	Overflight sighted a small sheen coming off a jack up barge, boom is in place around jack up barge. PI team dispatched on 9Sep08. 10 Sep 08 Small light rainbow/silver sheen in the canal coming off of jack up barge. Oil boom is in place. Sheen is reported outside and inside barge. MST1 Wilkes 10 Sep08 Jack up barge has been righted. Still surrounded with sorbent boom. Pumps on the way. MST1 Wilkes	
13	3	4-Sep-08	882852	Coquille Bay Field	Condensate	Unknown	Damaged facility and well head spraying gas	Hillside Oil & Gas LLC	Contacted RP to ensure source secured 6SEP08 (NOJOY). 10 Sep 08 Craig Thagard contacted at number listed. (432)683-2220. Changed from Destroyed to damaged facility. Description oil changed to gas. Facility has been repaired and is operating normally. 1 reserve oil tank has no product. Gas well has been secured. 1bbl spill from damage has been cleaned. Found to be duplicate report of previous entry; ID# 34. MST1 Wilkes	Not releasing oil during 6SEP overflight. Contact facility to ensure Hurricane Plan enacted prior to storms. Awaiting overflight results.
ID	Status	Date/ Time	NRC #	Location	Product Amt	Sheen / Slick size	Source Description	RP	Update	Future Actions

UNIFIED COMMAND SPILL LOG

ID	Status	Date/ Date/	NRC #	Location	Product	Sheen / Slick size	Source	RP	Update	Future Actions
14	1	2 Sep 08/ 1200		5-10 miles north of Venice	Natural Gas	N/A	Natural Gas well head leak. BNM released.	Unknown	Requested CBP Overflight 7SEP08, need results. 10 Sep 08 No updates were given from the 7 Sep 08 overflight. No RP is listed and no Contact information is listed. MST1 Wilkes	Find RP. Conduct overflight to check report. 10 Sep 08 Identify and contact RP. Conduct overflight to verify report. MST1 Wilkes
15	3	1 SEP 08/0900	882395	HARAHAN - ACL FLEET MM107.7LD B	POTENT IAL - 2,000 GALLON S/DIESE L. 2,000 gallons reported to be onboard.	Initially reported to be leaking, Task Force team on scene reported no sheen/no pollution	PARTIALLY SUNK 75' TUG M/V BUD WEBER stem aground, bow floating. 2000 gallons reported to be onboard	ACL	Bill Foster, ACL Sorbent boom has been placed around the tug.	Vsl has been salvaged. Source Secured. No further action required.
16	1	2 Sep 08/ 1430		Viosca Knoll (18-20 NM East of Garden Island Bay) (NABORS OFFSHORE VK-900)			Shell helo overflight reported a "significant sheen." Chevron will be conducting overflight of area 2-3 Sep and will report back.		Flight results are 150 ft X 1 mile rainbow and silvery sheen. A Chevron crew on scene 4 Sep 08, leak was from a damaged pipe on the sump. Approx. 32 gal discharged. Requested CBP Overflight 7SEP08. 10 Sep 08 No updates were given from the 7 Sep 08 overflight. No RP is listed and no Contact information is listed. MST1 Wilkes	Follow up with RP. Awaiting overflight results. 10 Sep 08 Identify and contact RP. Conduct overflight to verify report. MST1 Wilkes
17	1	2 Sep 08/ 1738		Morgan City zone		Leaking pipeline - bubbling to surface	Overflight to check - 3 Sep 08	unknown	10 Sep 08 Under Source description it is noted that an overflight was scheduled to take place on 3 Sep 08. No updates were given from that overflight. MST1 Wilkes	Follow up with RP (Morgan City). 10 Sep 08 Conduct overflight to verify report. MST1 Wilkes
18	1	4-Sep-08		Breton Sound	Natural Gas	No Sheen	Natural Gas leak from a well head		BNM released. Requested CBP Overflight 7SEP08. 10 Sep 08 Did not contact due to time constraints towards end of work day. Please be sure to follow up as soon as possible. MST1 Wilkes	Conduct overflight to check report. Identify RP
19	3	4-Sep-08		Eloi Bay Field	UNKNO WN	Unknown	Sheens from multiple well heads. Dark slick coming from facility. Cox Operating L.L.C. is RP Tim Morrison ph 214-420- 7714	Cox	7SEP08 Left message with Tim Morrison. Overflight will be conducted on 9 Sep 08. 8Sep08 - Contacted Tim, Cox is checking all of their facilities and equipment. Will send all of the lat/longs to verify that they have been checked. 9Sep09 CG overflight conducted, no sheen or oil sighted.	No further action required.

UNIFIED COMMAND SPILL LOG

		Time			Amt	/ color	Description			
20	3	4-Sep-08	882809		UNKNO WN	Black Slick	A boomed off slick was seen under Mariners Facility.	Mariner Energy	Called Obrien's Group who is investigating. 10Sep08 Contacted Melanie. Received NRC# for this case. Silvery sheen caused by overflow of oil sump which contained only residual oil. Sheen was cleaned by 1400 on 5Sep08. She denied the report of a black slick as described earlier. MST1 Wilkes	Follow up with RP and ensure clean- up.
21	3	4-Sep-08			UNKNO WN	Unknown	Deck Barge on its side in a natural slip.	Unknown	Overflight sighted a small sheen coming off a jack up barge; boom is in place around jack up barge. PI team dispatched on 9Sep08. Insert summary from MSTC's email.	No further action required. Duplicate report
22	3	1 Sep 08/ 1600		MM 88	UNKNO WN	Unknown	Tug Leaking Fuel, affecting St. Bernard water intake. Task Force team investigated, no sheen, oil, or vessel found in vicinity.	unknown	Task force found no pollution in the area.	No further action required.
23	3	2 Sep 08/1349		MM 87	N/A	N/A	Task force found a derelict tug, M/V LIZ partially submerged, no fuel onboard, no pollution. Possibly related to the report from 1 Sep near MM 88.			No further action required.
24	3	3-Sep-08	882643	Quarantine Bay	Crude	UNK	Wellhead	COX	8Sep08 - Contacted Tim Morrison he will call later with updates on all facilities and spills plus coordinates for discharges. 10Sep08 Contacted Tim Morrison. He stated that the wellhead had a bad valve that resulted in the reported discharge. The valve has been replaced and the discharge is secured. The discharged oil has been removed and is no longer a threat to the environment. Noticed that ID# 1 is possibly duplicate entry. MST1 Wilkes	Follow up with Tim Morrison again.
25	3	2 Sep 08/1545		South West Pass		Sliver Sheen- 50 ft x .5 miles	Overflight conducted - 2 Sep 08			Sheen only. No further action required.
26	3	2 Sep 08/ 1830	882950	Barataria Bay	UNKNO WN	Rainbow Sheen/ spraying well head	Natural Gas well head leak. Overflight 0800 3 Sep, BNM issued	Forest Oil	FPN: N08063 - \$5k - USES - Well secured - no remaining pollution.	Cost Documentation Pends. No further response required.
ID	Status	Date/	NRC #	Location	Product	Sheen / Slick size	Source	RP	Update	Future Actions

UNIFIED COMMAND SPILL LOG

		Time			Amt	/ color	Description			
27	3	3-Sep-08		Industrial Canal	5-10 BBLs		Sheen in Industrial Canal	Unknown		Sheen. Vsl salvage being monitored by USCG. Duplicate report.
28	3	4-Sep-08	882625	Barataria Bay		.5 mile X .5 mile	Silver sheen found around a facility.	Forest Oil	Sent 7SEP08 AUX PI Qualified Overflight to verify. 7SEP ES&H notified by Forest Oil. Forest Oil secured leak.	No further action required.
29	3	4-Sep-08	882770	Municipal Yacht Harbor - Metairie	25 gal	500 X 1000 Rainbow	Uwell Potts (504-432-7955) reports a rainbow sheen coming from a sunken boat. Product is unknown	unk	FOSCR responded. Responsible party cleaned oil.	No further action required.
30	3	4-Sep-08		East of Venice	Crude/Uknown	Unknown	There is a rainbow sheen that is coming up	unk		Sheen. No further action required.
31	3	4-Sep-08		NE of Main Pass and East of Venice	Crude	Unknown	Several sheens seen inside of secondary containment	Texas Petroleum		Sheen. No further action required.
32	2	4-Sep-08	882846		Crude	Unknown	Slick and sheen from partially destroyed facility	Yuma E&P	Contact ES&H Robert Cannon 5 September - USCG on scene with OMI deployed 500 feet of boom, discovered approximately 20 oiled brown pelicans. Yuma takes responsibility. 6 September - USCG, FWS, ES&H, Yuma on scene recovered all recoverable oil and 17 oiled pelicans. 8 September - 10 pelicans released, crane barge on-scene to begin salvage operations of concrete barge. RP: Yuma. Original FPN: N08064 - \$15k - Oil Mop. 10 Sep 08 Talked to Rob Cannon, all live birds have been cleaned and released. Any casualties or critical care animals have been transferred to Baton Rouge facility. ES&H is en route this morning with sorbent pads to recover any residual oil that has leached from marsh. Remediation will continue on an as needed basis. Call for Updates. Noticed to be duplicate of #6 MST1 Wilkes	10 Sep 08 Continue clean-up and UC oversight. Contact facility to ensure Hurricane Plan enacted prior to storms. MST1 Wilkes
33	2	4-Sep-08		Chandeleur Sound Block 73		Unknown	Destroyed Facility producing a sheen.	Meridian Res & Exp	10 Sep 08 Contacted Tammy at 337-867-3852. Barge has oil in it that will be pumped off Friday. There is no sheen in water. Water is "bright and clean" Barge is aground, oil is going to be lightered to move barge back into place. Contact Tammy on Friday afternoon or Morning for update on lightering evolution. MST1 Wilkes	Contact RP ensure sources secured.
34	3	4-Sep-08	882852		Crude	Unknown	Storage tanks in canal at facility with sheen coming off.	Hillside Oil & Gas or Harvest	10 Sep 08 found to be duplicate report of previous entry; ID#13. MST1 Wilkes	Contact RP ensure sources secured.
ID	Status	Date/	NRC #	Location	Product	Sheen / Slick size	Source	RP	Update	Future Actions

UNIFIED COMMAND SPILL LOG

		Time			Amt	/ color	Description			
35	3	5-Sep-08	882860	Delacroix	3-5 BBLs Black Oil		Platform - unknown causes- platform is shut in.	Yuma	FOSCR / PI responded 6 SEP. 1 bbl in sump. 1 bbl on deck. No impact to marsh. Cleanup complete 6SEP08.	No further action required.
36	1	5-Sep-08	882872	South Pass		UNK SHEEN 7920' x 60"	Unknown sheen from unknown source		10 Sep 08 Did not contact due to time constraints towards end of work day. Please be sure to follow up as soon as possible. MST1 Wilkes	Locate source. Contact RP
37	1	5-Sep-08	882834	paradise	crude 1.5 bbl		sump	ascent energy	10 Sep 08 Did not contact due to time constraints towards end of work day. Please be sure to follow up as soon as possible. MST1 Wilkes	
38	1	5-Sep-08	882881	Main Pass	UNKNO WN		Unknown	Devon Energy	10 Sep 08 Did not contact due to time constraints towards end of work day. Please be sure to follow up as soon as possible. MST1 Wilkes	N/A
39	2	6-Sep-08	883004	Breton Sound	Unknown	1.5mile x .5mile rainbow	Sheen	Unknown	10 Sep 08 No Source has been identified.	10 Sep 08 Recommend an overflight to verify that the source cannot be identified and that it is not still discharging. MST1 Wilkes
40	3	7-Sep-08	883056	west delta 24	.04 crude	1 mile x 30 ' silver	leak from abandoned well	Mcmoran oil and gas	rp bleeding well and monitoring well	No further action required.
41	1	7-Sep-08	883063	Chalmette	Mineral Oil	4 gal	Transformer	Entergy	10 Sep 08 Did not contact due to time constraints towards end of work day. Please be sure to follow up as soon as possible. MST1 Wilkes	Follow up with RP
42	1	7-Sep-08	883075	South Pass 49	Unknown	Unknown	Unknown	Unknown	10 Sep 08 Did not contact due to time constraints towards end of work day. Please be sure to follow up as soon as possible. MST1 Wilkes	Follow up with RP.
43	1	7-Sep-08	883076	South Pass 77A	Unknown	2 mile x 100'	South Pass 77A	Unknown	10 Sep 08 Did not contact due to time constraints towards end of work day. Please be sure to follow up as soon as possible. MST1 Wilkes	Follow up with RP
44	3	5-Sep-08	883081	Main Pass Block 6	unknown	3 miles x ?	facility	Apache	10 Sep 08 Leaking hose. Problem has been resolved. Oil recovered. The discharged oil has been removed and is no longer a threat to the environment. MST1 Wilkes	No further action required.
45	2	5-Sep-08	882881	Main Pass Block 69	unknown	5 miles x ?	facility	Devon Energy Production	10 Sep 08 PO Adams talked with RP. Release was from drip pan. Source have been secured, clean up is underway. Related to report 45, 46,47. MST1 Wilkes	Follow up with RP
46	2	5-Sep-08	882881	Main Pass Block 69	unknown	2 miles x ?	living quarters	Devon Energy Production	10 Sep 08 PO Adams talked with RP. Release was from drip pan. Source have been secured, clean up is underway. Related to report 45, 46,47. MST1 Wilkes	Follow up with RP
ID	Status	Date/	NRC #	Location	Product	Sheen / Slick size	Source	RP	Update	Future Actions

UNIFIED COMMAND SPILL LOG

		Time			Amt	/ color	Description			
47	2	5-Sep-08	882881	Main Pass Block 69	unknown	1 mile x ?	facility	Devon Energy Production	10 Sep 08 PO Adams talked with RP. Release was from drip pan. Source have been secured, clean up is underway. Related to report 45,46,47. MST1 Wilkes	Follow up with RP
48	2	5-Sep-08		Main Pass Block 69	1-2 bbl	No Sheen	oil in pipe line containment	Chevron Pipe Line	10 Sep 08 PO Adams spoke with Doug Blakemore at Chevron. Sump overfilled. Source has been secured, cleanup underway. MST1 Wilkes	Follow up with RP
49	2	5-Sep-08	882762	Saturday Island Field	unknown	2 miles x ?	facility	Burlington Res Oil and Gas	Contact name Shirley Ebert. 10 Sep 08 Severe tank damage reported. 1498BBLS un accounted for. MST1 Wilkes	10 Sep 08 Conduct overflight to check report of unaccounted for oil. MST1 Wilkes
50	3	5-Sep-08		Manilla Village	20 bbl	oil in marsh	facility	Ceydeco	10 Sep 08 No oil, sheen or pollution found. Overflight conducted on 10 Sep 08 by PO Klostermeyer. Debris in this position may have been mistaken for pollution. John Calvin with LDEQ verified from boat as clean. MST1 Wilkes	No further action required.
51	2	5-Sep-08	882966	Manilla Village	5 bbl	oil in marsh	concrete storage barge	Land & Exploration Co.	10 Sep 08 PO Adams contacted LLE Shirley Ebert. Hatch on barge worked itself open during storm. Source is secured. Cleanup underway. MST1 Wilkes	Follow up with RP
52	2	5-Sep-08		Bay Batiste	unknown	Sheen	facility	Hilcorp Energy	10 Sep 08 PO Adams spoke with Hilcorp representative who indicated sheen IVO facility did not originate with their facility. Facility has been boomed off as per Facility SOP. MST1 Wilkes	10 Sep 08 Conduct overflight to verify. MST1 Wilkes
53	2	5-Sep-08		Magnolia Field	unknown	sheen	sunken barge	Edward Oil Co.	10 Sep 08 Contacted John McCool. No environmental impact or pollution in this area at this time. Will conduct overflight. MST1 Wilkes	10 Sep 08 No further contact with RP is needed. Follow up with overflight. MST1 Wilkes
54	3	5-Sep-08		Point a La Hache field	unknown	heavy sheen, 0.5 miles long	Wellhead or flow line, impacting marsh	Bass Enterprise	Company checking with field; will call back. 10 Sep 08 Spoke with Bass. Contact number for employees on scene Jimmy @ (504)382-6181 or Enos (504)382-6239 10 Sep 08 No impact or pollution at this time. MST1 Wilkes	No further action required.
55	3	5-Sep-08		Lake Campo field	unknown	No Sheen	partially destroyed production barge, tanks in the water	Yuma E&P Co.	Company reports that these are dry gas wells with no oil and no water. 10 Sep 08 No threat to the environment. MST1 Wilkes	No further action required.
56	3	5-Sep-08		Black Bay	unknown	100 yd sheen	Leaking flow line	Helis Oil & Gas Co.	Company checking with field; will call back.	Follow up with RP
57	1	5-Sep-08		Bay St. Elaine	unknown	no description	Leaking flow line	Burlington Res Oil and Gas	MSU Houma AOR. Contact name Shirley Ebert. 10 Sep 08 Could not contact Shirley Ebert. Left message. No return phone call.	Follow up w/ Houma
58	3	5-Sep-08		Golden Meadow	unknown	sheen	tank battery	Apache	Morgan City AOR. Contact Charles Savoy. (337)232-1702 10 Sep 08 No oil, sheen or pollution at this time. MST1 Wilkes	No further action required
ID	Status	Date/	NRC #	Location	Product	Sheen / Slick size	Source	RP	Update	Future Actions

UNIFIED COMMAND SPILL LOG

		Time			Amt	/ color	Description			
59	3	8-Sep-08		Saturday Island Field	unknown	sheen	Well #233361	Forest Oil	Crew was on-scene; no sheen found.	No further action required.
60	3	8-Sep-08		Bay de Chene Field	Unknown	Sheen	Facility	Swift Energy	Company checking with field; will call back. 10 Sep 08 Spoke with Bob Redweik with Swift Energy. There is no longer a pollution threat in this location. MST1 Wilkes	Follow up with RP
61	3	8-Sep-08		Kings Ridge Field	Unknown	Sheen	Facility, possibly produced water	Alpine Exploration Co.	MSU Houma AOR 10 Sep 08 Spoke with Jim Washington with Alpine Exploration Co. Gustav caused a heater treated vessel to tip over. The vessel was full of water with less than approximately 1BBL of residual oil. On 8 Sep 08 a crane arrived O/S to lift the vessel. During the lifting operation, some of the sheen was released from containment. On 9 Sep 08 Alpine hired their OSRO to clean up the pollution threat. Cleanup was completed by that afternoon. MST1 Wilkes	No further action required
62	3	8-Sep-08		Little Lake Field	unknown	sheen	facility	JGC Energy	09 Sep: Absorbent and Hard boom placed; well is still shut in.	No further action required.
63	2	8-Sep-08		Little Lake Field	Unknown	Sheen	Partially sunken production barge	JGC Energy	Containment walls on barge broke. Company hired White Tale services to clean. Barge is not sunken; water rose. 10 Sep 08 Spoke with Chris Goodnight with JGC. Pollution is no longer a threat at this location. However, the barge may need to be salvaged and JGC has no plans as of right now to salvage the barge. MST1 Wilkes	10 Sep 08 Pass this salvage concern to the Salvage Dept. and let them determine whether or not the barge needs to be salvaged. MST1 Wilkes
64	3	8-Sep-08		Bayou Couba	unknown	1 mile sheen in canal	facility	Dune Operating	Company found sheen around salt water tank. Boom placed blocking canal. Oil Mop to call NRC.	No further action required.
65	1	8-Sep-08		Timbalier Bay	Unknown	Multiple Sheens	Facility	Maritech Res.	Morgan City AOR 10 Sep 08 Did not contact due to time constraints towards end of work day. Please be sure to follow up as soon as possible. MST1 Wilkes	Follow up w/ Morgan City
66	1	8-Sep-08		Bully Camp Field	unknown	heavy sheen	facility	Hilcorp Energy	MSU Houma AOR 10 Sep 08 Did not contact due to time constraints towards end of work day. Please be sure to follow up as soon as possible. MST1 Wilkes	Follow up w/ Houma
67	1	8-Sep-08		South 72	Unknown	40NMX20 NM	~50 gallons disturbed area	Taylor Energy	Origin of this sheen may have been from original damage from IVAN, re-disturbed by Gustav. Contact Denise Fields 9 Sep 08 Southern Sea Plane reported only sheen. 10 Sep 08 OSRO identified as the O'Briens group Aaron Holden (985)781-0804 MST1 Wilkes	Follow up with RP
68		9-Sep-08		Hilcorp Energy Company	UNKNO WN	none	facility	Hilcorp Energy	flew over spill on Sep 8--no sheen	No further action required
69	1	10-Sep-08		Mosquito Bay Field	UNKNO WN	2 miles x ?	facility	Williams Gas Pipeline	same area number 58	Follow up with RP
70	1	10-Sep-08		Golden Meadow Field	UNKNO WN	1 mile	facility	Aspect Energy		Follow up with RP
ID	Status	Date/	NRC #	Location	Product	Sheen / Slick size	Source	RP	Update	Future Actions

UNIFIED COMMAND SPILL LOG

		Time			Amt	/ color	Description			
71	1	10-Sep-08		Golden Meadow Field	UNKNO WN	Unknown	tank battery	apache Corporation		Follow up with RP
72		1-Sep-08	882422	Geismar, LA					Chlorine / 4lbs	facility
73		5-Sep-08	882876	Baton Rouge, LA					Anhydrous Ammonia / 100lbs, Hydrogen Sulfide / 100lbs, Nitrogen Dioxide / 1000lbs, Nitrogen Oxide / 1000lbs, Sulfur Dioxide / 500lbs.	facility
74		5-Sep-08	882884	White Castle, LA					Mineral Oil, 460gal	facility

SIGNIFICANT NOTIFICATIONS FOR SPILLS/RELEASES-HURRICANE IKE

Sunday, September 14, 2008

Type of Release	City/Parish	Responsible Party	Quantity	Remedial Actions	Impact	Comments
Mineral Oil	Thibodaux/Lafourche	Entergy	90 gallons	Entergy contractor used absorbent material on the pavement and scraped the contaminated soil.	Released to soil and pavement	LDEQ conducted a phone assessment. The Entergy contractor used a Chlor-N-Oil PCB field screening kit to verify there was no PCB hazard. No threat to public safety
Sulfur Dioxide	Shreveport/Caddo	Calumet Lubricants LLC	>500 lbs.	Re-routed gases out of sulfur recovery unit; Shut unit down until power is restored.	Released to air	LDEQ conducted a phone assessment. Plant personnel had secured the release by routing the sulfur dioxide to a flare.
Crude Oil	Chauvin/Terrebonne	PetroQuest Energy LLC	2 barrels	Planned to wash down the containment and collect the sheen off of the marsh.	Released to secondary containment and water;	LDEQ conducted a phone assessment. The release was secured. The incident was forwarded to the LDEQ SERO water group for further investigation.
Saltwater/crude oil	Frierson/De Soto	JW Operating	Crude oil ~5 barrels Saltwater ~17 barrels	Contained spill area with absorbent booms and soil. Scraped contaminated soil into a roll-off box.	Released to soil	LDEQ conducted a phone assessment. The release was secured and cleanup was almost completed. This is a DNR regulated site.

SIGNIFICANT NOTIFICATIONS FOR SPILLS/RELEASES-HURRICANE GUSTAV

Sunday, September 14, 2008

Type of Release	City/Parish	Responsible Party	Quantity	Remedial Actions	Impact	Comments
Benzene/Xylene/Flammable Liquid	Baton Rouge/East Baton Rouge	ExxonMobil Refinery	Benzene >10 lbs. Xylene >100 lbs. Flammable Liquid >100 lbs.	Depressurized atmospheric tower; Used water curtains; Repaired leak.	Released to concrete	LDEQ conducted a phone assessment. Refinery personnel had secured the release. No off- site or environmental impact. No threat to public safety. Refinery stationary air monitors detected no vapors.

ATTACHMENT F

RADIATION ASSESSMENT REPORT

RADIATION ASSESSMENT REPORT

Parish	Total	Completed	Remaining
Acadia	1	1	0
Ascension	13	13	0
Assumption	1	1	0
Calcasieu	43	43	0
East Baton Rouge	64	64	0
Iberia	10	10	0
Iberville	8	8	0
Jefferson	41	41	0
Jefferson Davis	4	4	0
Lafayette	46	46	0
Lafourche	7	7	0
Livingston	3	3	0
Orleans	30	30	0
Plaquemines	12	12	0
St. Bernard	1	1	0
St. Charles	13	13	0
St. James	6	6	0
St. John	6	6	0
St. Mary	10	10	0
St. Martin	1	1	0
St. Tammany	30	30	0
Tangipahoa	9	9	0
Terrebonne	22	22	0
Vermillion	3	3	0
Totals	384	384	0

ATTACHMENT G

SUPERFUND SITE ASSESSMENT REPORT

SUPERFUND SITE ASSESSMENT REPORT

DEQ AI	Super Fund Site Name	Inspection	Status	EPA ID #	Proposed	Final	Construction	Partial	Deletion	Targeted
	ASCENSION PARISH									
4260	<u>Cleve Reber</u>	9/8/08	No hurricane damage noted	<u>LAD980501456</u>	<u>12/30/82</u>	<u>9/8/83</u>	12/31/96	N/A	12/30/97	1
5217	<u>Dutchtown Treatment Plant</u>	9/8/08	No hurricane damage noted	<u>LAD980879449</u>	<u>1/22/87</u>	<u>7/22/87</u>	1/12/98	N/A	11/16/99	1
4714	<u>Old Inger Oil Refinery</u>	9/8/08	Trees on fence but not much fence damage	<u>LAD980745533</u>	<u>12/30/82</u>	<u>9/8/83</u>	9/12/06	N/A	8/12/08	1
	BOSSIER PARISH									
5347	<u>Highway 71/72 Refinery</u>		Not in a targeted Parish	<u>LAD981054075</u>	<u>2/13/95</u>	N/A	N/A	N/A	N/A	0
	CALCASIEU PARISH									
293	<u>Gulf State Utilities-North Ryan Street</u>		Not in a targeted Parish	<u>LAD985169317</u>	<u>2/13/95</u>	N/A	N/A	N/A	N/A	0
	CAMERON PARISH									
329	<u>Mallard Bay Landing Bulk Plant</u>		Not in a targeted Parish	<u>LA0000187518</u>	<u>5/11/00</u>	<u>7/27/00</u>	9/18/03	N/A	9/19/05	0
	EAST BATON ROUGE PARISH									
86800	<u>Devil's Swamp - Ewell Property</u>	9/8/08	No hurricane damage noted	<u>LAD981155872</u>	<u>3/8/04</u>	N/A	N/A	N/A	N/A	1
83225	<u>Petro-Processors of Louisiana Inc</u>	9/8/08	Power off; water has accumulated in treatment syst. Will use alt. pump method if necessary	<u>LAD057482713</u>	<u>9/8/83</u>	<u>9/21/84</u>	7/31/03	N/A	N/A	1

SUPERFUND SITE ASSESSMENT REPORT

DEQ AI	Super Fund Site Name	Inspection	Status	EPA ID #	Proposed	Final	Construction	Partial	Deletion	Targeted
	EAST FELICIANA PARISH									
1416	<u>Central Wood Preserving Co.</u>	9/8/08	No Hurricane damage, National Guard filling site with debris	<u>LAD008187940</u>	<u>1/19/99</u>	<u>5/10/99</u>	9/8/04	N/A	N/A	1
	IBERVILLE PARISH									
4715	<u>Bayou Sorrel Site</u>	9/9/08	No hurricane damage noted	<u>LAD980745541</u>	<u>12/30/82</u>	<u>9/21/84</u>	5/26/92	N/A	9/29/97	1
	LIVINGSTON PARISH									
2941	<u>Combustion, Inc.</u>	9/9/08	Moderate to heavy damage to trees (Phytoremediation remedy)	<u>LAD072606627</u>	<u>6/24/88</u>	<u>8/30/90</u>	6/26/06	N/A	N/A	1
	ORLEANS PARISH									
84977	<u>Agriculture Street Landfill</u>	9/9/08	No hurricane damage noted	<u>LAD981056997</u>	<u>8/23/94</u>	<u>12/16/94</u>	4/2/02	<u>6/15/00</u>	N/A	1
	RAPIDES PARISH									
12443	<u>Ruston Foundry</u>	9/9/08	No hurricane damage noted	<u>LAD985185107</u>	<u>1/19/99</u>	<u>5/10/99</u>	N/A	N/A	N/A	1
	ST. TAMMANY PARISH									
4716	<u>Bayou Bonfouca</u>	9/5/08	Flashing damaged - being repaired by oversight contractor. Re-started groundwater treatment system.	<u>LAD980745632</u>	<u>12/30/82</u>	<u>9/8/83</u>	9/30/97	N/A	N/A	1

SUPERFUND SITE ASSESSMENT REPORT

DEQ AI	Super Fund Site Name	Inspection	Status	EPA ID #	Proposed	Final	Construction	Partial	Deletion	Targeted
1344	<u>Madisonville Creosote Works</u>	9/5/08	Skylight broken - being repaired by oversight contractor	<u>LAD981522998</u>	<u>6/17/96</u>	<u>12/23/96</u>	6/16/00	N/A	N/A	1
1260	<u>Southern Shipbuilding</u>	9/5/08	No hurricane damaged noted	<u>LAD008149015</u>	<u>2/13/95</u>	<u>5/26/95</u>	9/15/97	N/A	6/16/98	1
	TANGIPAHOA PARISH									
2328	<u>Delatte Metals</u>	9/5/08	No hurricane damage noted	<u>LAD052510344</u>	<u>7/28/98</u>	<u>1/19/99</u>	9/22/03	N/A	8/8/05	1
	UNION PARISH									
1482	<u>Marion Pressure Treating</u>		Not in a targeted Parish	<u>LAD008473142</u>	<u>10/22/99</u>	<u>2/4/00</u>	N/A	N/A	N/A	
	VERMILION PARISH									
5416	<u>D.L. Mud, Inc.</u>	9/6/08	No hurricane damage noted	<u>LAD981058019</u>	<u>6/24/88</u>	<u>10/4/89</u>	6/30/99	N/A	3/7/00	1
4805	<u>Gulf Coast Vacuum Services</u>	9/6/08	No hurricane damage noted	<u>LAD980750137</u>	<u>6/24/88</u>	<u>3/31/89</u>	9/20/99	N/A	7/23/01	1
4790	<u>PAB Oil & Chemical Service, Inc.</u>	9/6/08	No hurricane damage noted	<u>LAD980749139</u>	<u>6/24/88</u>	<u>3/31/89</u>	8/28/98	N/A	1/3/00	1
	WEBSTER PARISH									
8993	<u>Louisiana Army Ammunition Plant</u>		Not in a targeted Parish	<u>LA0213820533</u>	<u>7/22/87</u>	<u>3/13/89</u>	N/A	N/A	N/A	0
	WINN PARISH									
316	<u>American Creosote Works, Inc (Winnfield)</u>		Not in a targeted Parish	<u>LAD000239814</u>	<u>2/7/92</u>	<u>10/14/92</u>	6/4/99	N/A	N/A	0

SUPERFUND SITE ASSESSMENT REPORT

DEQ AI	Super Fund Site Name	Inspection	Status	EPA ID #	Proposed	Final	Construction	Partial	Deletion	Targeted
	Super Fund Removal Actions									
	POINTE COUPEE									
44491	Point Coupee Wood Preservers	9/4/08	No significant hurricane damage noted							1
	LAFAYETTE									
44077	Cactus Pipe	9/9/08	No hurricane damage noted							1
Totals										19

ATTACHMENT H

AQUATIC MORTALITIES REPORT

FISH KILL REPORT

Date	Parish	Report
9/5/2008	EBR	2
9/6/2008	EBR	1
9/7/2008	EBR	1
9/7/2008	Iberville & Assumption	1
9/8/2008	Terrebonne	1
9/8/2008	EBR	5
9/8/2008	Lafourche	1
9/8/2008	Jefferson Davis	1
9/9/2008	Lafourche	1
9/9/2008	Iberia	1
9/9/2008	Livingston	1
9/9/2008	EBR	2
9/10/2008	Iberville & Assumption	1
9/10/2008	Jeff Davis	1
9/10/2008	Lafourche	2
9/11/2008	Iberville	2
	Totals	24

ATTACHMENT I

VISUAL IMAGES OF HURRICANE GUSTAV IMPACTED AREAS

TOWN OF GRAND ISLE AFTER HURRICANE GUSTAV



10 1:15 PM

PHOTO 1 OF 6

TOWN OF GRAND ISLE AFTER HURRICANE GUSTAV



PHOTO 2 OF 6

TOWN OF GRAND ISLE AFTER HURRICANE GUSTAV



PHOTO 3 OF 6

TOWN OF GRAND ISLE AFTER HURRICANE GUSTAV



PHOTO 4 OF 6

TOWN OF GRAND ISLE AFTER HURRICANE GUSTAV



PHOTO 5 OF 6

TOWN OF GRAND ISLE AFTER HURRICANE GUSTAV



PHOTO 6 OF 6

PORT FOURCHON AFTER HURRICANE GUSTAV



PHOTO 1 OF 8

PORT FOURCHON AFTER HURRICANE GUSTAV



PHOTO 2 OF 8

PORT FOURCHON AFTER HURRICANE GUSTAV



PHOTO 3 OF 8

PORT FOURCHON AFTER HURRICANE GUSTAV



PHOTO 4 OF 8

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PORT FOURCHON AFTER HURRICANE GUSTAV



10 1:22 PM

PHOTO 5 OF 8

PORT FOURCHON AFTER HURRICANE GUSTAV



PHOTO 6 OF 8

PORT FOURCHON AFTER HURRICANE GUSTAV



PHOTO 7 OF 8

PORT FOURCHON AFTER HURRICANE GUSTAV



TOWN OF GOLDEN MEADOW AFTER HURRICANE GUSTAV



PHOTO 1 OF 7

TOWN OF GOLDEN MEADOW AFTER HURRICANE GUSTAV



PHOTO 2 OF 7

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TOWN OF GOLDEN MEADOW AFTER HURRICANE GUSTAV



PHOTO 3 OF 7

TOWN OF GOLDEN MEADOW AFTER HURRICANE GUSTAV



PHOTO 4 OF 7

TOWN OF GOLDEN MEADOW AFTER HURRICANE GUSTAV



10 1:30 PM

PHOTO 5 OF 7

TOWN OF GOLDEN MEADOW AFTER HURRICANE GUSTAV



10 1:30 PM

TOWN OF GOLDEN MEADOW AFTER HURRICANE GUSTAV



10 1:30 PM

PHOTO 7 OF 7

TOWN OF LEEVILLE AFTER HURRICANE GUSTAV



PHOTO 1 OF 5

TOWN OF LEEVILLE AFTER HURRICANE GUSTAV



PHOTO 2 OF 5

TOWN OF LEEVILLE AFTER HURRICANE GUSTAV



PHOTO 3 OF 5

TOWN OF LEEVILLE AFTER HURRICANE GUSTAV



PHOTO 4 OF 5

TOWN OF LEEVILLE AFTER HURRICANE GUSTAV



PHOTO 5 OF 5